

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-8				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number    1			Econ. sup Haz. Waste. Generato				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: This action initiates WA 1-8 with an LOE of 221 hours. Lyn Lubin is appointed as the WAM and Phuc Phan is appointed as the alt. WAM. The statement of work is attached. The contractor shall provide a work plan/cost estimate.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
SFO <span style="border: 1px solid black; padding: 2px;">22</span> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
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2										
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4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
04/30/2012   To   04/29/2014										
This Action:						221				
Total:						221				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name   Lyn Luben						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number   703-308-0508				
						FAX Number:   703-308-7903				
Project Officer Name   Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:   703-605-0509				
						FAX Number:   703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name   Christie Deskiewicz						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:   202-564-3316				
						FAX Number:				

**EPA CONTRACT NUMBER EP-W-12-013**

**Statement of Work**

Work Assignment Number: 1-08

Work Assignment Amendment Number: zero

Title: Economic Analysis and Related Support for: **Improvements to the Hazardous Waste Generator Regulatory Program, and Associated RCRA Work**

Work Assignment Manager (WAM): Lyn D Luben

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Work Assignment Alternate Manager: Phuc Phan

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Washington, D.C. 20460

Telephone: (703)-306-1013



## **BACKGROUND:**

Sec Work Assignment B-08.

## **PURPOSE AND SCOPE OF THIS WORK ASSIGNMENT:**

The purpose of this Work Assignment (WA) is to build on work conducted under WA B-08 and to continue to provide for all analytical assessment needs related to costs, economic impacts, benefits, small entity impacts, information collection request (ICR), document preparation, and related technical and supporting analyses necessary to sustain the Agency's promulgation of the proposed rule: "Improvements to the Hazardous Waste Generator Regulatory Program."

The scope of this WA includes: analytical methodology development; baseline determination; data collection, assessment, and quality control; model development; options analysis; sensitivity analyses within options; and document preparation. This SOW also includes assessment of impacts to small entities, and assessment of impacts to minority and low-income communities (environmental justice), assessment of unfunded mandates, and assessment of all other Executive Orders and Acts pertinent to this action.

Finally, this WA includes the preparation of emergency turnaround assessments, general supporting materials, briefings, general project coordination, and ongoing communication/outreach to the Contracting Officer Representative (COR).

## **WORK STATEMENT:**

### **Task 1. Work Plan, Progress Reports and Budget**

Within twenty (20) days of receipt of this work assignment, the contractor shall deliver a work plan. This plan shall include a proposed level of effort, budget, schedule of tasks, and schedule of deliverables. A cost proposal shall accompany this work plan.

All data collection, assessment, and quality issues associated with this Work Assignment shall adhere to EPA data quality guidance and requirements, as established in EPA Order 5360.1A2, EPA Manual 5360.A1, and OSWER's and ORCR's Quality Management Plans. See: [http://www.epa.gov/quality/qa\\_docs.html](http://www.epa.gov/quality/qa_docs.html)

As part of the monthly progress reports for this Work Assignment, the Contractor shall provide a summary of all data collection and quality control activities conducted during each month.

No confidential business information (CBI) shall be collected or used under this Work Assignment. However, proprietary data may be used following written approval from the COR.

No contractor travel is authorized under this Work Assignment.

**Deliverable(s) and Schedule:**

Work Plan and Budget within allotted time frame identified above.

**Task 2:        Programmatic Support**

The contractor shall provide programmatic support in the area of short-term or quick turnaround technical assistance, analysis, and supporting documents to ORCR for the proposed rule **“Improvements to the Hazardous Waste Generator Regulatory Program,”** and related work.

Under this task the contractor shall develop and submit various general support documents and analyses directly or indirectly related to the proposed rule. Examples of such documents/analyses may include, but not be limited to:

- cost or cost savings summary tables addressing impacts of one or more of the regulatory improvement areas;
- briefing packages;
- fact sheets, flow charts, or presentation graphics;

The need for and number of such documents is uncertain at the time of this work assignment, as is the full scope and exact focus of the rule. The WAM will provide a Technical Directive (TD) designed to clarify the need and scope of such document(s), as necessary. ***The contractor shall budget for approximately one (1) TD under this Task.***

Work under this task shall build upon but not duplicate work conducted under Work Assignment B-08.

**Deliverable(s) and Schedule:**

DELIVERABLES	DUE DATES
Development of quick-turnaround support documents and analyses related to the rule:	Draft: Five Agency working days from receipt of TD and all supporting information.
To be defined in the TD (e.g., briefing package, fact sheet)	Final: Five Agency working days from receipt of all written WAM comments on draft.

**Task 3:        Regulatory Support**

The contractor shall provide technical, cost, economic, human health and ecological benefits, and related analytical analyses and support to ORCR in development of the proposed regulation: **“Improvements to the Hazardous Waste Generator Regulatory Program.”** Under this Task, the contractor shall establish two analytic baselines for each impacts-related aspect of the proposal. There shall be a regulatory baseline and a “real world” baseline. The regulatory

baseline shall assume 100 percent compliance with all Federal and state requirements, the “real world” baseline shall be an estimate of actual compliance of both federal and State requirements. The contractor shall develop an approach for establishing a “real world” baseline and present this approach to the WAM prior to applying this baseline. Real world baseline development shall be initiated upon contractor receipt of this approved work assignment.

Building from each baseline, the contractor shall develop an analytical methodology, create the analytic model, and apply this model to estimate the economic impacts, costs, and benefits of the proposed approach for each improvement. The contractor shall also identify analytical limitations associated with the assessment for each issue/improvement assessment, or summarized in aggregate.

As this project advances, additional regulatory improvements, alternative options, and/or scenarios within options may be identified and require assessment. These modifications may be the result of Team determinations, ORCR management directives, or OMB comments. The additional needs discussed in this paragraph will be identified, as necessary, via a Technical Directive (TD) issued by the COR. The contractor shall budget for approximately two (2) TDs under this Task.

**Note:** No work was conducted under this Task under Work Assignment B-08 due because no supporting information was presented to the contractor by the COR. This was due to Agency informational limitations and scheduling issues.

**Deliverable(s) and Schedule:**

Draft and final deliverables shall be presented in response to the baseline development and methodology/assessment requirements. Draft and final deliverables shall also be submitted in response to each TD. The deliverables shall be in memo format, and include a description of the analytical methodology, description of the data (universe, unit cost, etc.) and sources, presentation of findings, and identification of the key analytical limitations. Costs or cost savings (and other benefits) to both the regulated community and governmental entities (Federal, state, and local) shall be presented. Tables, charts, and graphics shall be incorporated, as appropriate for both sets of deliverables, to enhance and clarify the presentation.

DELIVERABLES	DUE DATES
A) Baseline Development: Regulatory and Real World	<p><u>Draft Real World Methodology</u>: “Real World” methodology within fifteen (15) Agency working days following contractor receipt of this signed work assignment <i>plus all necessary supporting information</i>.</p> <p><u>Final Real World Methodology</u>: Five (5) Agency working days following contractor receipt of all COR written comments on the draft.</p> <p><u>Regulatory Baseline</u>: No later than ten (10) Agency working days following COR approval of the final “real world” baseline methodology.</p>
B) Economic impacts, costs, and benefits of the proposed approach for each improvement	<p><u>Draft Findings, by Issue</u>: No later than ten (10) Agency working days following COR receipt of Regulatory Baseline.</p> <p><u>Final Findings, by Issue</u>: No later than five (5) Agency working days following contractor receipt of all written COR comments on the draft.</p>
C) Per Each Technical Directive	<p><u>Draft</u>: Five (10) Agency working days following contractor receipt of each TD plus all necessary supporting information.</p> <p><u>Final</u>: Five (5) Agency working days following contractor receipt of all COR written comments on the draft.</p>

#### **Task 4: Data Collection, Review, and Evaluation**

The contractor shall continue to collect technical data, and provide analytical support for data related to the assessment of costs, benefits, and other impacts of the improvements to the hazardous waste generator regulatory program. This data collection shall include, but not be limited to the following: baseline establishment and universe characterization (CESQG<sup>1</sup>, SQG, and LQG), identification of affected universe (regulated entities and government), estimated number of responses, unit cost or cost savings impacts (O&M and

<sup>1</sup> The contractor shall contact and work with Phuc Phan (703-306-1013) of the Office of Resource Conservation and Recovery (ORCR) for development of the most recent CESQG universe estimate(s).

capital), benefits factors, and labor-hour burden by proposed improvement, and labor category.

The contractor shall document all data sources, collection methodology, assumptions, analytical rules, and principles used for data collection, manipulation, and analyses.

**Deliverable(s) and Schedule:**

The deliverables under this Task shall document all data collected (e.g., baseline characterization, affected universe, unit costs), the data sources, data collection approach and quality control procedures, data assessment methodology, summary of data findings, key collection and assessment assumptions, and data limitations. Tables, charts, and graphic shall be included, as appropriate, to ensure clarity and ease of understanding.

The draft deliverable for this set shall be due to the COR no later than twenty (20) Agency working days following contractor receipt of this approved Work Assignment, plus all necessary supporting information. The final deliverable shall incorporate all written comments received from the COR and be delivered no later than ten (10) Agency working days following contractor receipt of all such comments.

The final deliverables under this Task shall be used, as appropriate, in the development of deliverables under Tasks 2, 3, 5, 6, and 7 of this Work Assignment.

**Task 5: Economic Assessment Document**

**Sub-Task A:**

Under this sub Task the contractor shall provide the necessary support to the Agency by conducting qualitative and quantitative analyses and assessments, and document preparation for the economic assessment document to be entitled: *Assessment of the Potential Costs, Benefits, and Other Impacts of the Improvements to the Hazardous Waste Generator Regulatory Program, As Proposed*. The contractor shall document the analytical methodology, assumptions, rules and principles used in the preparation of this document. This assessment document shall address costs or cost savings, economic impacts, benefits (qualitative), and other impacts related to all appropriate Executive Orders and Acts (e.g., environmental justice, small entity impacts, unfunded mandates). This document shall include, but not be limited to the following: executive summary, table of contents, purpose and objectives, assessment of non regulatory alternatives and need for regulatory action, data and methodology, findings (cost, economic, and benefit) for each regulatory improvement (see Purpose) by proposed approach and key options (individually, and in aggregate), assessment of all relevant Executive Orders and Acts, key assumptions and limitations, and references. This Economic Assessment document shall also contain a qualitative discussion of jobs impacts potentially associated with this proposed action.

Incorporated into the Environmental Justice Assessment shall be an analysis of potential EJ impacts associated with the transfer of multiple small quantities of exempt hazardous waste from CESQGs to a LQG owned by the same company. The contractor shall employ the EPA tool **EJScreen** in the Environmental Justice assessment for this action.

This economic assessment shall adhere to all relevant requirements established under Executive Order (EO) 12866, as amended by EO 13563, OMB guidance document A-4, and the most recent EPA guidance on the preparation of economic assessments and regulatory impact analyses.

#### Sub-Task B:

In addition to the above, the Agency may require additional supporting analyses, assessments, and documents not yet identified, but that are related to the Economic Assessment. Under this sub task, the contractor shall be prepared to develop and submit various general support documents and analyses related to alternative regulatory or non regulatory actions associated with the targeted regulatory improvements or new and currently undefined improvements. The actual need for and scope/focus of such additional support documents is uncertain at the time of issuance of this task area. The COR will provide a TD designed to clarify the need and scope of such document(s), as necessary. The contractor shall budget for approximately two (2) TDs under this sub Task.

**Note:** Because all work under this Task was linked to the date of Workgroup Closure, or a Technical Directive, no work was conducted for this Task under Work Assignment B-08.

#### **Deliverable(s) and Schedule:**

Two sets of deliverables are required under this Task:

Sub-Task A: The contractor shall deliver draft and final versions of the complete Assessment document, as described above. The draft version shall be due to the COR no later than five (5) working days prior to Agency Workgroup Closure for this proposed action. The final Assessment document shall incorporate all written comments received from the COR and be delivered no later than ten (10) Agency working days following contractor receipt of all such comments.

Sub-Task B: All deliverables under this Sub-Task shall be TD driven. No work shall be conducted or deliverables prepared under this Sub-Task without a Technical Directive. Draft and final deliverables shall be presented in response to each TD. The draft deliverable shall be due to the COR no later than ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information. The final deliverable shall incorporate all written comments received from the COR on the draft, and be due no later than five (5) Agency working days following contractor receipt of all such comments.

**Task 6: Information Collection Request (ICR) Document**

No requirements under this Task.

**Deliverable(s) and Schedule:**

No deliverables under this Task.

**Task 7: General RCRA Support**

Regulatory and non regulatory support requirements under RCRA are wide ranging and diverse. Multiple projects are ongoing simultaneously, often requiring various levels of support on a short turnaround basis. Under this Task, the contractor shall be prepared to develop cost, economic, benefit and other impact assessments targeted toward a wide range of diverse projects and level of effort associated with RCRA facilities and requirements. For example, requirements under this Task may include such projects as: a waste quantity assessment for the hazardous waste combustion MACT proposed rule, or a summary assessment of the "Cost of RCRA." Actual requirements under this task are not yet determined and will be clarified in a Technical Directive (TD). The contractor shall budget for approximately two (2) TDs under this Task.

**Deliverable(s) and Schedule:**

Draft and final deliverables shall be presented under this Task, for each Technical Directive. Each deliverable shall include charts, tables, and graphics, as necessary, plus plain English writing to ensure clarity of presentation.

The draft deliverable for each TD shall be due to the COR no later than ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting documentation. The final deliverable shall be due no later than five (5) Agency working days following contractor delivery of all written COR comments on the draft.

<b>Summary of Deliverables and Schedule</b>		
<b><i>Task and Deliverable(s)</i></b>	<b><i>Draft</i></b>	<b><i>Final</i></b>
<b>Task 1: <u>Work Plan, Progress Reports and Budget</u></b>		
Initial Work Plan and Budget	As required by Contract.	As required by Contract.
<b>Task 2: <u>Programmatic Support</u></b>		
Development of quick-turnaround support documents and analyses related to the rule:  To be defined in each TD (e.g., briefing package, fact sheet)	<u>Draft</u> : Five Agency working days from receipt of TD and all supporting information.	<u>Final</u> : Five Agency working days from receipt of all written WAM comments on draft.
<b>Task 3: <u>Regulatory Support</u></b>		
<b>A) Baseline Development: Regulatory and Real World</b>	<u>Draft Real World Methodology</u> : "Real World" methodology within fifteen (15) Agency working days following contractor receipt of this signed work assignment plus all necessary supporting information.	<u>Final Real World Methodology</u> : Five (5) Agency working days following contractor receipt of all COR written comments on the draft.  <u>Regulatory Baseline</u> : No later than ten (10) Agency working days following COR approval of the final "real world" baseline methodology.
<b>B) Economic impacts, costs, and benefits of the proposed approach for each improvement</b>	<u>Draft Findings, by Issue</u> : No later than ten (10) Agency working days following COR approval of final Regulatory Baseline.	<u>Final Findings, by Issue</u> : No later than five (5) Agency working days following contractor receipt of all written COR comments on the draft.
<b>C) Per Each Technical Directive</b>	<u>Draft</u> : <del>Five</del> <sup>Ten</sup> (10) Agency working days following contractor receipt of each TD plus all necessary supporting information.	<u>Final</u> : Five (5) Agency working days following contractor receipt of all COR written comments on the draft.



**Task 4: Data Collection, Review, and Evaluation**

Data Collection, Review, and Evaluation	Twenty (20) Agency working days following contractor receipt of this approved Work Assignment, plus all necessary information from COR.	Ten (10) Agency working days following contractor receipt of all COR comments on draft.
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**Task 5: Economic Assessment Document**

Sub-Task A: Economic Assessment Document	Five (5) working days prior to Agency Workgroup Closure for this proposed action.	Ten (10) Agency working days following contractor receipt of all written comments on the draft
Sub-Task B: Additional Supporting Documents, Per Each TD.	Ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information	Five (5) Agency working days following contractor receipt of all written comments on draft

**Task 6: Information Collection Request (ICR) Document**

None	None	None
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**Task 7: General RCRA Support**

TD Deliverable(s)	Ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information	Five (5) Agency working days following contractor receipt of all written comments on draft
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## **WORK ASSIGNMENT ADDITIONAL REQUIREMENTS OFFICE OF RESOURCE CONSERVATION AND RECOVERY**

The following additional terms and conditions are requirements of this task order:

### **TECHNICAL DIRECTION**

In accordance with EPAAR 1552.237-71–*Technical Direction*, the WAM will provide Technical Direction during performance of this Work Assignment. Technical direction includes:

1. Instruction to the contractor that approves approaches, solutions, designs, or refinements; fills in details; completes the general description of work; shifts emphasis among work areas or tasks; and
2. Evaluation and acceptance of reports or other deliverables.

Technical Direction must be within the scope of the contract-level SOW. The WAM does not have the authority to issue Technical Direction which:

1. Requires additional work outside the scope of the contract or Work Assignment;
2. Constitutes a change as defined in the "Changes" clause;
3. Causes an increase or decrease in the estimated cost of the contract or Work Assignment;
4. Alters the period of performance of the contract or Work Assignment; or
5. Changes any of the other express terms or conditions of the contract or Work Assignment.

Technical Direction will be issued in writing by the WAM, or confirmed by the WAM in writing within five (5) calendar days after oral issuance, if oral instruction provided.

### **QUALITY ASSURANCE**

Performance under this Work Assignment requires the contractor to prepare a Quality Assurance Project Plan (QAPP) to be included as part of the Work Assignment. The contractor shall submit a QAPP with its Work Plan in accordance with *EPA Requirements for Quality Assurance Project Plans (QA/R-5)* found here:

<http://www.epa.gov/QUALITY/qs-docs/r5-final.pdf>. The contractor's QAPP must be approved by the WAM and Quality Assurance Manager before Work Plan approval. Following approval of the contractor's QAPP, the contractor shall perform all tasks under this Work Assignment in accordance with the quality standards established in the QAPP.

## **SURVEY MANAGEMENT**

Performance under this Work Assignment may require the contractor to create statistical surveys, perform data collection, use questionnaires, **or perform statistical analysis of survey data**. The contractor shall perform these tasks in accordance with the *EPA Survey Management Handbook* found here: <http://www.epa.gov/oamcinc1/0710295/attach12.pdf>.

## **COMMUNICATIONS PRODUCTS**

Performance under this Work Assignment may require the contractor to develop deliverables that are considered by EPA to be “Communications Products.” If relevant, the contractor shall develop Communications Products in accordance with *EPA’s Policy and Implementation Guide for Communications Product Development and Approval* found here: <http://www.epa.gov/productreview/guide/index.html>. Additionally, if Communications Products require the use of EPA graphics, logos, or other identifiable materials, the Communications Products are further subject to the standards in *EPA’s Visual and Product Standards Graphics Manual* found here: <http://wedcor.cor.epa.gov/pages/TIM/VisualIdentity-6-19-07.pdf>.

<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <h1 style="margin: 0;">EPA</h1> </div> <div style="text-align: center;"> <p>United States Environmental Protection Agency Washington, DC 20460</p> <h2 style="margin: 0;">Work Assignment</h2> </div> </div>		<p>Work Assignment Number 1-8</p> <p><input type="checkbox"/> Other    <input checked="" type="checkbox"/> Amendment Number: 000001</p>																																																																		
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<p>Project Officer Name   Shannon Sturgeon</p> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div>_____</div> <div>_____</div> </div> <p style="text-align: center; font-size: x-small;">(Signature)                      (Date)</p>		<p>Branch/Mail Code:</p> <p>Phone Number:   703-605-0509</p> <p>FAX Number:   703-308-7903</p>																																																																		
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<p>Contracting Official Name   Christie Deskiewicz</p> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div>_____</div> <div>_____</div> </div> <p style="text-align: center; font-size: x-small;">(Signature)                      (Date)</p>		<p>Branch/Mail Code:</p> <p>Phone Number:   202-564-3316</p> <p>FAX Number:</p>																																																																		

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-8				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000002				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number       4			Haz Waste Generator Reg Prog				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: The purpose of this amendment is to add an additional LOE of 599 hours in order to initiate and continue work under Tasks 3 through 7. The new total LOE is now 820 hours. The statement of work is attached. The contractor shall submit a work plan/cost estimate reflecting the additional work.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <span style="border: 1px solid black; padding: 2px;">22</span> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
04/30/2012   To   04/29/2014										
This Action:						820				
Total:						820				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name   Lyn Luben						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number   703-308-0508				
						FAX Number:   703-308-7903				
Project Officer Name   Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:   703-605-0509				
						FAX Number:   703-308-7903				
Other Agency Official Name   Lee Hofmann						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:   703-308-8479				
						FAX Number:				
Contracting Official Name   Christie Deskiewicz						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:   202-564-3316				
						FAX Number:				

**EPA CONTRACT NUMBER EP-W-12-013**

**Statement of Work**

Work Assignment Number: 1-08

Work Assignment Amendment Number: 1

Title: Economic Analysis and Related Support for: **Improvements to the Hazardous Waste Generator Regulatory Program, and Associated RCRA Work**

Work Assignment Manager (WAM): Lyn D Luben

Address: ERAS/ORCR/OSWER  
Mail Code 5305P  
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(703) 308-7903 (FAX)

Work Assignment Alternate Manager: Phuc Phan

Address: ERAS/ORCR/OSWER  
Mail Code 5305P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460

Telephone: (703)-306-1013

## **BACKGROUND:**

See the original Work Assignment.

## **PURPOSE AND SCOPE OF THIS WORK ASSIGNMENT AMENDMENT:**

The purpose of this Work Assignment Amendment is to build on work conducted under the previous Work Assignment. This Amendment shall ensure the continued analytical assessment needs related to costs, economic impacts, benefits, small entity impacts, information collection request (ICR), document preparation, and related technical and supporting analyses necessary to sustain the Agency's promulgation of the proposed rule: "Improvements to the Hazardous Waste Generator Regulatory Program."

The scope of this WA Amendment includes: refinements to the previous analytical methodology; baseline adjustments; new and refined data collection, assessment/quality control; expanded model development; alternative options/sensitivity analyses; and ICR development, and Economic Assessment document preparation. The primary focus of this Amendment shall be on preparation of a complete Economic Assessment document, and all necessary supporting analyses feeding into this document. This includes impacts to small entities, assessment of impacts to minority and low-income communities (environmental justice), assessment of unfunded mandates, and assessment of all other Executive Orders and Acts pertinent to this action.

Finally, this WA includes the preparation of emergency turnaround assessments, general supporting materials, briefings, general project coordination, and ongoing communication/outreach to the Contracting Officer Representative (COR).

## **WORK STATEMENT:**

### **Task 1. Work Plan, Progress Reports and Budget**

Within twenty (20) days of receipt of this work assignment amendment, the contractor shall deliver a work plan. This plan shall include a proposed level of effort, budget, schedule of tasks, and schedule of deliverables. A cost proposal shall accompany this work plan.

All data collection, assessment, and quality issues associated with this Amendment shall adhere to EPA data quality guidance and requirements, as established in EPA Order 5360.1A2, EPA Manual 5360.A1, and OSWER's and ORCR's Quality Management Plans. See: [http://www.epa.gov/quality/qa\\_docs.html](http://www.epa.gov/quality/qa_docs.html)

As part of the monthly progress reports for this Work Assignment, the Contractor shall provide a summary of all data collection and quality control activities conducted during each month.

No confidential business information (CBI) shall be collected or used in conjunction with this Amendment. However, proprietary data may be used following written approval from the COR.

This Amendment includes limited travel for the contractor. The contractor is approved for one roundtrip excursion from Cambridge/Boston to Washington, D.C. (Arlington, VA). This travel shall be for no more than two days and one night, include no more than two Ilic. personnel.

**Deliverable(s) and Schedule:**

Work Plan and Budget within allotted time frame identified above.

**Task 2:        Programmatic Support**

No additional work under this Amendment.

**Deliverable(s) and Schedule:**

DELIVERABLES	DUE DATES
N/A	N/A

**Task 3:        Regulatory Support**

The contractor shall continue to provide technical, cost, economic, human health and ecological benefits, and related analytical analyses and support to ORCR in development of the proposed regulation: “**Improvements to the Hazardous Waste Generator Regulatory Program.**”

Under this Task, the contractor shall refine the two analytic baselines (i.e., 100% compliance and “real world”) for each impacts-related aspect of the proposal.

Building from each refined baseline, the contractor shall revise the analytical methodology and analytic model for assessment of the proposal, and options. The contractor shall also identify and new analytical limitations not previously considered under the initial baseline and model development.

As with the original Work Assignment, additional regulatory improvements, alternative options, and/or scenarios within options may continue to be identified and require assessment. These modifications may be the result of Team determinations, ORCR management directives, or OMB comments. These additional needs will be identified, as necessary, via a Technical Directive (TD) issued by the COR. The contractor shall budget for no more than two (2) TDs under this Task.

**Deliverable(s) and Schedule:**

Aside from the TDs, the deliverables under this Task shall be incorporated into the



Assessment document, as described under Task 5 below.

Draft and final deliverables shall be submitted in response to each TD. These deliverables shall be in memo format, and include a description of the analytical methodology (if appropriate), description of the data (universe, unit cost, etc.) and sources, presentation of findings, and identification of the key analytical limitations. Tables, charts, and graphics shall be incorporated, as appropriate for both sets of deliverables, to enhance and clarify the presentation.

DELIVERABLES	DUE DATES
Technical Support Materials	Must be incorporated into the draft and final EA document, as described under Task 5
Per Each Technical Directive	Draft: Ten (10) Agency working days following contractor receipt of each TD plus all necessary supporting information.  Final: Five (5) Agency working days following contractor receipt of all written COR comments on the draft.

**Task 4: Data Collection, Review, and Evaluation**

The contractor shall continue to collect technical data, and provide analytical support for data related to the assessment of costs, benefits, and other impacts of the improvements to the hazardous waste generator regulatory program.

The contractor shall document all data sources, collection methodology, assumptions, analytical rules, and principles used for data collection, manipulation, and analyses.

**Deliverable(s) and Schedule:**

The deliverables under this Task shall be incorporated into the draft and final EA documents, per the schedule outlined under Task 5 below.

**Task 5: Economic Assessment Document**

This Task shall build upon all work conducted under Task 5 of the prior Work Assignment.

Under this Task, the contractor shall prepare a complete the Economic Assessment document that incorporates all relevant EA supporting work conducted under other Tasks of this Work Assignment Amendment. This document shall be entitled: *Assessment of the Potential Costs, Benefits, and Other Impacts of the Improvements to the Hazardous*

*Waste Generator Regulatory Program, As Proposed.* This document shall generally follow, and be consistent with the annotated outline submitted and approved under the prior Work Assignment.

This document shall contain a description of the baseline and baseline (both) development, analytical methodology, assumptions, findings, and analytical limitations. Findings shall address costs and cost savings, economic impacts, benefits (qualitative), and other impacts related to all appropriate Executive Orders and Acts (e.g., environmental justice, small entity impacts, unfunded mandates). This document shall include, but not be limited to the following: executive summary, table of contents, purpose and objectives, need for regulatory action, assessment of regulatory and non regulatory alternatives, description of data and methodology, findings (as discussed above), description and findings related to all relevant Executive Orders and Acts, key assumptions and limitations, and references. This Economic Assessment document shall also contain a qualitative discussion of jobs impacts potentially associated with this proposed action.

Incorporated into the Environmental Justice Assessment shall be an analysis of potential EJ impacts associated with the transfer of multiple small quantities of exempt hazardous waste from CESQGs to an LQG or LQG consolidation facility owned by the same company. The contractor shall employ the EPA tool *EJScreen* in the Environmental Justice assessment for this action.

This economic assessment shall adhere to all relevant requirements established under Executive Order (EO) 12866, as amended by EO 13563, OMB guidance document A-4, and the most recent EPA guidance on the preparation of economic assessments and regulatory impact analyses.

#### **Deliverable(s) and Schedule:**

The contractor shall deliver draft and final versions of the complete Assessment document, as described above. The draft version shall be due to the COR no later than August 9<sup>th</sup>, 2013. The final Assessment document shall incorporate all written comments received from the COR and be delivered no later than five (5) Agency working days following contractor receipt of all such comments.

#### **Task 6: Information Collection Request (ICR) Document**

Under this Task, the contractor shall prepare an Information Collection Request (ICR) supporting document for the proposed rule. This document shall adhere to the ICR Outline, as presented in Appendix A of this Amendment, and be consistent with all requirements established in the Agency's ICR Handbook.<sup>1</sup>

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<sup>1</sup> ICR Handbook *EPA's Guide to Writing Information Collection Requests Under the Paperwork Reduction Act of 1995*

No work shall begin under this Task without contractor receipt of a signed Technical Directive (TD) from the COR. This Technical Directive will provide the additional technical information necessary for the contractor to initiate and complete the ICR document.

**Deliverable(s) and Schedule:**

DELIVERABLES	DUE DATES
Per the Technical Directive	<p><u>Draft:</u> Ten (10) Agency working days following contractor receipt of the TD plus all necessary supporting information.</p> <p><u>Final:</u> Five (5) Agency working days following contractor receipt of all written COR comments on the draft.</p>

**Task 7: General RCRA Support**

Regulatory and non regulatory support requirements under RCRA are wide ranging and diverse. Multiple projects are ongoing simultaneously, often requiring various levels of support on a short turnaround basis. Under this Task, as with the prior Work Assignment, the contractor shall be prepared to develop cost, economic, benefit and other impact assessments targeted toward a wide range of diverse projects and level of effort associated with RCRA facilities and requirements. Actual requirements under this task are not yet determined and will be clarified in a Technical Directive (TD). The contractor shall budget for approximately two (2) TDs under this Task.

**Deliverable(s) and Schedule:**

For each Technical Directive under this Task, draft and final deliverables shall be presented. Each deliverable shall include charts, tables, and graphics, as necessary to ensure clarity of presentation.

The draft deliverable for each TD shall be due to the COR no later than ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting documentation. The final deliverable shall be due no later than five (5) Agency working days following contractor delivery of all written COR comments on the draft.

Summary of Deliverables and Schedule		
<i>Task and Deliverable(s)</i>	<i>Draft</i>	<i>Final</i>
<b>Task 1: <u>Work Plan, Progress Reports and Budget</u></b>		
Initial Work Plan and Budget	As required by Contract.	As required by Contract.
<b>Task 2: <u>Programmatic Support</u></b>		
N/A	N/A	N/A
<b>Task 3: <u>Regulatory Support</u></b>		
Technical Support Materials	Must be incorporated into the draft and final EA document, according to the Task 5 schedule	
Per Each Technical Directive	Ten (10) Agency working days following contractor receipt of each TD plus all necessary supporting information.	Five (5) Agency working days following contractor receipt of all written COR comments on the draft.
<b>Task 4: <u>Data Collection, Review, and Evaluation</u></b>		
Data Collection, Review, and Evaluation	Deliverables under this Task shall be incorporated into the draft and final EA documents, per the schedule outlined under Task 5.	
<b>Task 5: <u>Economic Assessment Document</u></b>		
Economic Assessment Document	August 9 <sup>th</sup> , 2013	Five (5) Agency working days following contractor receipt of all written COR comments on draft.

**Task 6: Information Collection Request (ICR) Document**

Per the Technical Directive	Ten (10) Agency working days following contractor receipt of the TD plus all necessary supporting information.	Five (5) Agency working days following contractor receipt of all written COR comments on the draft.
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**Task 7: General RCRA Support**

Per Each Technical Directive	Ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information	Five (5) Agency working days following contractor receipt of all written comments on draft
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## **WORK ASSIGNMENT ADDITIONAL REQUIREMENTS OFFICE OF RESOURCE CONSERVATION AND RECOVERY**

The following additional terms and conditions are requirements of this task order:

### **TECHNICAL DIRECTION**

In accordance with EPAAR 1552.237-71–*Technical Direction*, the WAM will provide Technical Direction during performance of this Work Assignment. Technical direction includes:

1. Instruction to the contractor that approves approaches, solutions, designs, or refinements; fills in details; completes the general description of work; shifts emphasis among work areas or tasks; and
2. Evaluation and acceptance of reports or other deliverables.

Technical Direction must be within the scope of the contract-level SOW. The WAM does not have the authority to issue Technical Direction which:

1. Requires additional work outside the scope of the contract or Work Assignment;
2. Constitutes a change as defined in the "Changes" clause;
3. Causes an increase or decrease in the estimated cost of the contract or Work Assignment;
4. Alters the period of performance of the contract or Work Assignment; or
5. Changes any of the other express terms or conditions of the contract or Work Assignment.

Technical Direction will be issued in writing by the WAM, or confirmed by the WAM in writing within five (5) calendar days after oral issuance, if oral instruction provided.

### **QUALITY ASSURANCE**

Performance under this Work Assignment requires the contractor to prepare a Quality Assurance Project Plan (QAPP) to be included as part of the Work Assignment. The contractor shall submit a QAPP with its Work Plan in accordance with *EPA Requirements for Quality Assurance Project Plans (QA/R-5)* found here:

<http://www.epa.gov/QUALITY/qs-docs/r5-final.pdf>. The contractor's QAPP must be approved by the WAM and Quality Assurance Manager before Work Plan approval. Following approval of the contractor's QAPP, the contractor shall perform all tasks under this Work Assignment in accordance with the quality standards established in the QAPP.

## **SURVEY MANAGEMENT**

Performance under this Work Assignment may require the contractor to create statistical surveys, perform data collection, use questionnaires, **or perform statistical analysis of survey data**. The contractor shall perform these tasks in accordance with the *EPA Survey Management Handbook* found here: [http://www.epa.gov/oaqc/inc1/0710295\\_attach12.pdf](http://www.epa.gov/oaqc/inc1/0710295_attach12.pdf).

## **COMMUNICATIONS PRODUCTS**

Performance under this Work Assignment may require the contractor to develop deliverables that are considered by EPA to be “Communications Products.” If relevant, the contractor shall develop Communications Products in accordance with *EPA's Policy and Implementation Guide for Communications Product Development and Approval* found here: <http://www.epa.gov/productreview/guide/index.html>. Additionally, if Communications Products require the use of EPA graphics, logos, or other identifiable materials, the Communications Products are further subject to the standards in *EPA's Visual and Product Standards Graphics Manual* found here: <http://wedcor.cor.epa.gov/pages/TIM/VisualIdentity-6-19-07.pdf>.

## APPENDIX A



# ICR SUPPORTING STATEMENT OUTLINE

## Part A Of The Supporting Statement

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All ICRs must include Part A of the Supporting Statement. ICRs developed for administering statistical survey instruments must also include Part B of the Supporting Statement. Part A of the Supporting Statement is composed of six major sections:

**1. Identification of the Information Collection--** This section provides the title of the ICR and presents an abstract describing the major components of the collection.

- 1(a) Title of the Information Collection
- 1(b) Short Characterization/Abstract

**2. Need for and use of the Collection--** This section provides information on the need for the collection and how the information will be used.

- 2(a) Need/Authority for the Collection
- 2(b) Practical Utility/Users of the Data

**3. Non duplication, Consultations, and Other Collection Criteria--** This section provides information on satisfying OMB's collection guidelines, performing consultations, and ensuring confidentiality.

- 3(a) Non duplication
- 3(b) Public Notice Required Prior to ICR submission to OMB
- 3(c) Consultations
- 3(d) Effects of Less Frequent Collection
- 3(e) General Guidelines
- 3(f) Confidentiality
- 3(g) Sensitive Questions

**4. The Respondents and the Information Requested--** This section provides information on each piece of information being collected and the activities associated with developing and submitting or filing that information from the respondent perspective.

- 4(a) Respondents/SIC Codes
- 4(b) Information Requested
  - (i) Data items, including record keeping requirements
  - (ii) Respondent Activities

**5. The Information Collected--Agency Activities, Collection Methodology, and Information Management--** This section provides information on the Agency activities that correspond with each piece of information collected, data management, small business burden, and collection schedules.

- 5(a) Agency Activities
- 5(b) Collection Methodology and Management
- 5(c) Small Entity Flexibility

#### 5(d) Collection Schedule

**6. Estimating The Burden and Cost of the Collection**--This section provides information on the cost and burden associated with the information collection for both the respondents and the Agency. It presents these cost and burden estimates as individual costs per respondent, and as an aggregate cost for the entire respondent universe and the Agency on an annual basis and over the entire period covered by the ICR.

- 6(a) Estimating Respondent Burden
- 6(b) Estimating Respondent Costs
  - (i) Estimating Labor Costs
  - (ii) Estimating Capital and Operations and Maintenance Costs
  - (iii) Capital/Start-up Operating and Maintenance (O&M) Costs
  - (iv) Annualizing Capital Costs
- 6(c) Estimating Agency Burden and Cost
- 6(d) Estimating the Respondent Universe and Total Burden and Costs
- 6(e) Bottom Line Burden Hours and Cost Tables
  - (i) Respondent Tally
  - (ii) The Agency Tally
  - (iii) Variations in the Annual Bottom Line
- 6(f) Reasons for Change in Burden
- 6(g) Burden Statement

#### **Part B of Supporting Statement**

**Part B.** Part B is required in addition to Part A, for information collections involving statistical sampling (such as surveys and questionnaires used to make inferences about a population from a subset of that population). Part B is not required for collecting information from the entire population (a census) or an anecdotal study of selected individuals

- 1) Introduction to Part B
- 2) Sections 1 and 2: Survey Objectives, Key Variables, and Survey Design
- 3) Sections 3 - 5: Pretests, Pilot Tests, Collection Methods, and Analyzing Survey Results



<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-8				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000003				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			1-08				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: The purpose of this amendment is to approve the contractor's work plan/cost estimate dated July 8, 2013 for a LOE of 519 hours and \$49,999.03. The new total LOE for this WA is now 740 hours and \$69,861.69 (b)(4) cost (b)(4) fee).										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2)    22										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 820				
04/30/2012   To   04/29/2014										
This Action:						-80				
Total:						740				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name   Lyn Luben						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number   703-308-0508				
						FAX Number:   703-308-7903				
Project Officer Name   Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:   703-605-0509				
						FAX Number:   703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name   Christie Deskiewicz						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:   202-564-3316				
						FAX Number:				

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-8	
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000004	
Contract Number EP-W-12-013		Contract Period 04/30/2013 To 04/29/2014				Title of Work Assignment/SF Site Name	
		Base <input checked="" type="checkbox"/> Option Period Number				Regulatory Reform and Streamli	
Contractor INDUSTRIAL ECONOMICS, INCORPORATED				Specify Section and paragraph of Contract SOW Entire Work Assignment			
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval				Period of Performance  From 04/30/2013 To 04/29/2014			
Comments: The only purpose of this Amendment is to place Phuc Phan, the current alternate, as the primary Work Assignment Manager on this Work Assignmnet, and to place Lyn D Luben as the alternate Work Assignment Manager.							
<input type="checkbox"/> Superfund    Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund							
Note: To report additional accounting and appropriations date use EPA Form 1900-69A.							
SFO (Max 2) <span style="border: 1px solid black; padding: 2px;">22</span>							
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)    (Cents)    Site/Project (Max 8)    Cost Org/Code (Max 7)
1							
2							
3							
4							
5							
Authorized Work Assignment Ceiling							
Contract Period: 04/30/2013 To 04/29/2014		Cost/Fee:			LOE:		
This Action:							
Total:							
Work Plan / Cost Estimate Approvals							
Contractor WP Dated:		Cost/Fee:			LOE:		
Cumulative Approved:		Cost/Fee:			LOE:		
Work Assignment Manager Name    Phuc Phan						Branch/Mail Code:	
_____ (Signature)    (Date)						Phone Number    703-306-1013	
						FAX Number:	
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:	
_____ (Signature)    (Date)						Phone Number:    703-605-0509	
						FAX Number:    703-308-7903	
Other Agency Official Name    Brian Nelson-Palmer						Branch/Mail Code:	
_____ (Signature)    (Date)						Phone Number:    202-564-6190	
						FAX Number:	
Contracting Official Name    Christie Deskiewicz						Branch/Mail Code:	
_____ (Signature)    (Date)						Phone Number:    202-564-3316	
						FAX Number:	

Work Assignment Form, (WebForms v1.0)

## **EPA CONTRACT NUMBER EP-W-12-013**

### **Statement of Work**

Work Assignment Number: 1-08

Work Assignment Amendment Number:

Title: Economic Analysis and Related Support for: **Improvements to the Hazardous Waste Generator Regulatory Program, and Associated RCRA Work**

Work Assignment Manager (WAM): Phuc Phan

Address: ERAS/ORCR/OSWER  
Mail Code 5305P  
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Washington, D.C. 20460

Telephone: (703)-306-1013

Work Assignment Alternate Manager: Lyn D Luben

Address: ERAS/ORCR/OSWER  
Mail Code 5305P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460

Telephone: (703)-308-0508  
(703) 308-5268 (front office)  
(703) 308-7903 (FAX)

## **BACKGROUND:**

See the original Work Assignment.

## **PURPOSE AND SCOPE OF THIS WORK ASSIGNMENT AMENDMENT:**

The purpose of this Work Assignment (WA) Amendment is to build on work conducted under the previous Work Assignment, and amendments. This Amendment shall continue to ensure the continued analytical assessment needs related to costs, economic impacts, benefits, small entity impacts, information collection request (ICR), EA document preparation, and related technical and supporting analyses necessary to sustain the Agency's promulgation of the proposed rule: "Hazardous Waste Generator Improvements Rule."

The scope of this WA Amendment may include: expanded analytical methodology; alternative baseline adjustments; ongoing new and refined data collection and quality control; analytical model expansion; alternative options/sensitivity analyses; ICR development, and continued Economic Assessment document preparation and revisions.

The primary focus of this Amendment shall be on compilation of the complete Economic Assessment document with revisions, preparation of an expanded benefits assessment chapter for the Assessment, preparation of an ICR outline and document template. The Assessment document shall include an analysis of impacts to small entities, assessment of impacts to minority and low-income communities (environmental justice), assessment of unfunded mandates, assessment of children's health impacts, and assessment of all other Executive Orders and Acts pertinent to this action. This Assessment shall also include a section on potential employment impacts.

Finally, this WA Amendment includes the continued potential need for preparation of emergency turnaround assessments, general supporting materials, briefings, general project coordination, and ongoing communication/outreach to the Work Assignment Manager (WAM) and alternate WAM.

## **WORK STATEMENT:**

### **Task 1.                      Work Plan, Progress Reports and Budget**

Within twenty (20) days of receipt of this work assignment amendment, the contractor shall deliver a work plan. This plan shall include a proposed level of effort, budget, schedule of tasks, and schedule of deliverables. A cost proposal shall accompany this work plan.

All data collection, assessment, and quality issues associated with this Amendment shall adhere to EPA data quality guidance and requirements, as established in EPA Order 5360.1A2, EPA Manual 5360.A1, and OSWER's and ORCR's Quality Management Plans. See: [http://www.epa.gov/quality/qa\\_docs.html](http://www.epa.gov/quality/qa_docs.html)



As part of the monthly progress reports for this Work Assignment Amendment, the Contractor shall provide a summary of all data collection and quality control activities conducted during each month.

No confidential business information (CBI) shall be collected or used in conjunction with this Amendment. However, proprietary data may be used following written approval from the WAM.

This Amendment includes no limited travel for the contractor. However, travel remains approved under the prior Amendment.

**Deliverable(s) and Schedule:**

Work Plan and Budget within allotted time frame identified above.

**Task 2:        Programmatic Support**

The contractor shall continue to be prepared to provide programmatic support in the area of short-term or quick turnaround technical assistance, analysis, and supporting documents to ORCR for the proposed rule.

Under this task the contractor shall develop and submit various general support documents and analyses directly or indirectly related to the proposed rule. Examples of such documents/analyses may include, but not be limited to:

- cost or cost savings summary tables addressing impacts of one or more of the regulatory improvement areas;
- brief benefits assessments for one or more of the regulatory improvement areas;
- general or specific briefing packages;
- fact sheets, flow charts, or graphics;

The need for and number of such documents remains uncertain at the time of this work assignment amendment. The WAM will provide a Technical Directive (TD) designed to clarify the need and scope of such document(s), as necessary. ***The contractor shall budget for approximately one (1) TD under this Task.***

Work under this task shall build upon but not duplicate work conducted under Work Assignment B-08, WA 1-08, and amendments.

**Deliverable(s) and Schedule:**

DELIVERABLES	DUE DATES
Development of quick-turnaround support documents and analyses related to the rule:  To be defined in the TD (e.g., briefing package, fact sheet)	<u>Draft</u> : Five Agency working days from receipt of TD and all supporting information.  <u>Final</u> : Five Agency working days from receipt of all written WAM comments on draft.

### **Task 3: Regulatory Support**

The contractor shall continue to provide technical assessment(s), cost and economic assessment(s), human health and ecological benefit assessment(s), and related analytical analyses and support to ORCR in development of the proposed regulation.

Under this Task, the contractor shall continue to refine the compliance baseline to ensure all relevant state and federal requirements currently in-place are accounted for. In addition, the contractor shall develop a *qualitative* assessment of the “real world” baseline. This qualitative real world baseline assessment shall be designed to allow for a qualitative or partially quantitative impacts estimation (for all reform categories), using this baseline.

Under this Task the contractor shall strengthen and enhance the analysis of potential cost savings associated with reduced requirements associated with one-time episodic waste generations. Under this Task the contractor shall refine and strengthen the analysis of negative hazardous waste determination and documentation for CESQGs.

Under this Task the contractor shall expand the benefits analysis for this proposed rulemaking to include a comprehensive qualitative assessment, for each issue category, PLUS a quantitative assessment for issue categories where data are available or can be estimated. These shall include, but not necessarily be limited to the following: benefits associated with the episodic generation provisions of the rule, benefits associated with the CESQG consolidation provisions of the rule, benefits associated with the LQG closure requirements, and benefits associated with the documentation of negative hazardous waste determinations. Benefits shall include, where feasible, monetized human health benefits, monetized ecological benefits, and cost savings. The analytical approach for any benefits data projections or quantified/monetized benefits findings must be fully transparent.

Under this task the contractor shall develop cost estimates for the labeling of containers at the consolidation/holding area, plus incorporate the per label cost of adding word descriptors of the waste, in addition to the waste code.

Under this Task the contractor shall develop estimates for the non hazardous waste determinations using the mean and the median. In addition, the contractor shall develop a sensitivity estimate using the 10<sup>th</sup> and the 90<sup>th</sup> percentiles.

Under this ask the contractor shall develop cost estimates for preparing an emergency action executive summary for both new facilities, and all LQG facilities.

Under this task the contractor shall develop recordkeeping cost estimates for all SQG and LQG generators associated with documenting and keeping records of their weekly container storage inspections (see language below). (Note: Several states already require this recordkeeping requirement for LQGs and some also for SQGs, but it is not currently a Federal requirement)

§ 265.174 Inspections.

At least weekly, the owner or operator must inspect areas where containers are stored, except for Performance Track member facilities, that must conduct inspections at least once each month, upon approval by the Director. To apply for reduced inspection frequency, the Performance Track member facility must follow the procedures described in § 265.15(b)(5) of this part. The owner or operator must look for leaking containers and for deterioration of containers caused by corrosion or other factors.

As with the original Work Assignment and past Amendment, additional regulatory support may continue to be necessary. This additional support may be the result of Team determinations, ORCR management directives, or OMB comments. Any additional support falling within the scope of this Task will be identified, as necessary, via a Technical Directive (TD) issued by the COR. **The contractor shall budget for no more than two (2) TDs under this Task.**

**Deliverable(s) and Schedule:**

Aside from the TD(s), the deliverables under this Task shall be incorporated into the Assessment document, as described under Task 5 below.

Draft and final deliverables shall be submitted in response to each TD. These deliverables shall be in memo format, and include a description of the analytical methodology (if appropriate), description of the data (universe, unit cost, etc.) and sources, presentation of findings, and identification of the key analytical limitations. Tables, charts, and graphics shall be incorporated, as appropriate for both sets of deliverables, to enhance and clarify the presentation.

DELIVERABLES	DUE DATES
Technical Support Materials	Must be incorporated into the draft and final EA document, as described under Task 5
Per Each Technical Directive	<u>Draft</u> : Ten (10) Agency working days following contractor receipt of each TD plus all necessary supporting information.  <u>Final</u> : Five (5) Agency working days following contractor receipt of all written COR comments on the draft.

#### **Task 4: Data Collection, Review, and Evaluation**

The contractor shall continue to collect necessary and appropriate data, assess data quality, and provide analytical support for data related to the assessment of costs, benefits, other impacts, and information collection/documentation requirements of the proposed rule. The contractor shall document all data sources, collection methodology, assumptions, analytical rules, and principles used for data collection, manipulation, and analyses.

#### **Deliverable(s) and Schedule:**

The deliverables under this Task shall be incorporated into the draft and final EA chapters of the EA documents, per the schedule outlined under Task 5 below.

#### **Task 5: Economic Assessment Document**

This Task shall build upon all work conducted under Task 5 of the prior Work Assignment, and amendment. Under this Task, the contractor shall continue to prepare individual chapters of the Economic Assessment document that incorporates all relevant EA supporting work conducted under other Tasks of this Work Assignment Amendment. **The new title for this document shall be: *Assessment of the Potential Costs, Benefits, and Other Impacts of the Hazardous Waste Generator Improvements Rule, As Proposed.*** This document shall generally follow, and be consistent with the annotated outline submitted and approved under the prior Work Assignment.

This document shall adhere to the outline and structure dated 9, 2013, except the order of Chapter Six shall be modified as identified below:

##### ***Chapter 6: Equity Considerations and Other Impacts***

**Regulatory planning and review:** requires examination and quantification of costs and benefits of regulating with and without the proposed rule;

**Regulatory flexibility:** focuses on the potential effects of the proposed rule on small entities;

**Unfunded mandates:** examines the implications of the proposed rule with respect to unfunded mandates;

**Federalism:** considers potential issues related to state sovereignty;

**Tribal governments:** extends the discussion of federal unfunded mandates to include impacts on Native American tribal governments and their communities;

**Environmental justice:** considers potential issues for minority and low-income populations;

**Children's health protection:** examines the potential impact of the proposed rule on the health of children;

**Energy Impacts:** examines the impacts of the proposed rule on energy use, supply, and distribution; and

**Employment impacts:** assesses the potential impact of the proposed rule on employment;

**Joint impacts of rules:** considers the combined effect of the proposed rule with other regulations affecting the healthcare sector.

This document shall include, but not be limited to the following: executive summary, table of contents, purpose and objectives, need for regulatory action, assessment of regulatory and non regulatory alternatives, description of data and methodology, findings (as discussed above), description and findings related to all relevant Executive Orders and Acts, key assumptions and limitations, and references.

Incorporated into the Environmental Justice Assessment shall be an analysis of potential EJ impacts associated with the transfer of multiple small quantities of exempt hazardous waste from CESQGs to an LQG or LQG consolidation facility owned by the same company. The contractor shall employ the EPA tool **EJScreen** in the Environmental Justice assessment for this action.

This economic assessment shall adhere to all relevant requirements established under Executive Order (EO) 12866, as amended by EO 13563, OMB guidance document A-4, and the most recent EPA guidance on the preparation of economic assessments and regulatory impact analyses.

**Deliverable(s) and Schedule:**

The contractor shall deliver draft and final versions of the complete Assessment document, as described above. The draft and final chapters of the EA document shall continue to be delivered according to the July 8, 2013 approved Work Plan.

**Task 6: Information Collection Request (ICR) Document**

Under this Task, the contractor shall prepare the following parts of the Information Collection Request (ICR) Supporting Document: 1) annotated outline, 2) full document template, and 3) complete the Exhibits addressing Respondent (includes State burden and cost) Burden and Cost and Agency Burden and Cost.

**Deliverable(s) and Schedule:**

DELIVERABLES	DUE DATES
ICR Annotated Outline	<u>Draft:</u> Ten (10) Agency working days following contractor receipt of this Work Assignment, plus all necessary supporting information.  <u>Final:</u> Five (5) Agency working days following contractor receipt of all written WAM comments on the draft.

Full Document Template	Five (5) Agency working days following contractor submission of Final outline.
Respondent and Agency Burden/Cost Exhibits	Ten (10) Agency working days following contractor submission of the Full Document Template.

**Task 7:        General RCRA Support**

Regulatory and non regulatory support requirements under RCRA are wide ranging and diverse. Multiple projects are ongoing simultaneously, often requiring various levels of support on a short turnaround basis. Under this Task, as with the prior Work Assignment and Amendment, the contractor shall be prepared to develop cost, economic, benefit and other impact assessments targeted toward a wide range of diverse projects and level of effort associated with RCRA facilities and requirements. Actual requirements under this task are not yet determined and will be clarified in a Technical Directive (TD). **The contractor shall budget for no more than two (2) TDs under this Task.**

**Deliverable(s) and Schedule:**

For each Technical Directive under this Task, draft and final deliverables shall be presented. Each deliverable shall include charts, tables, and graphics, as necessary to ensure clarity of presentation.

The draft deliverable for each TD shall be due to the WAM no later than ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting documentation. The final deliverable shall be due no later than five (5) Agency working days following contractor delivery of all written WAM comments on the draft.

<b>Summary of Deliverables and Schedule</b>		
<b><i>Task and Deliverable(s)</i></b>	<b><i>Draft</i></b>	<b><i>Final</i></b>

<b>Task 1: <u>Work Plan, Progress Reports and Budget</u></b>		
Initial Work Plan and Budget	As required by Contract.	As required by Contract.
<b>Task 2: <u>Programmatic Support</u></b>		
Development of quick-turnaround support documents and analyses related to the rule:  To be defined in the TD (e.g., briefing package, fact sheet)	Five (5) Agency working days from receipt of TD and all supporting information.	Five (5) Agency working days from receipt of all written WAM comments on draft.
<b>Task 3: <u>Regulatory Support</u></b>		
Technical Support Materials	Must be incorporated into the draft and final EA document, according to the Task 5 schedule	
Per Each Technical Directive	Ten (10) Agency working days following contractor receipt of each TD plus all necessary supporting information.	Five (5) Agency working days following contractor receipt of all written COR comments on the draft.
<b>Task 4: <u>Data Collection, Review, and Evaluation</u></b>		
Data Collection, Review, and Evaluation	Deliverables under this Task shall be incorporated into the draft and final EA documents, per the schedule outlined under Task 5.	
<b>Task 5: <u>Economic Assessment Document</u></b>		
Economic Assessment Document	Per approved schedule established in Work Plan dated July 8, 2013	Per approved schedule established in Work Plan dated July 8, 2013
<b>Task 6: <u>Information Collection Request (ICR) Document</u></b>		

ICR Annotated Outline	Ten (10) Agency working days following contractor receipt of this Work Assignment, plus all necessary supporting information.	Five (5) Agency working days following contractor receipt of all written WAM comments on the draft.
Full Document Template	N/A	Five (5) Agency working days following contractor submission of Final outline.
Respondent and Agency Burden/Cost Exhibits	N/A	Ten (10) Agency working days following contractor submission of the Full Document Template.
<b><u>Task 7: General RCRA Support</u></b>		
Per Technical Directive	Ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information	Five (5) Agency working days following contractor receipt of all written comments on draft



## **WORK ASSIGNMENT ADDITIONAL REQUIREMENTS OFFICE OF RESOURCE CONSERVATION AND RECOVERY**

The following additional terms and conditions are requirements of this task order:

### **TECHNICAL DIRECTION**

In accordance with EPAAR 1552.237-71–*Technical Direction*, the WAM will provide Technical Direction during performance of this Work Assignment. Technical direction includes:

1. Instruction to the contractor that approves approaches, solutions, designs, or refinements; fills in details; completes the general description of work; shifts emphasis among work areas or tasks; and
2. Evaluation and acceptance of reports or other deliverables.

Technical Direction must be within the scope of the contract-level SOW. The WAM does not have the authority to issue Technical Direction which:

1. Requires additional work outside the scope of the contract or Work Assignment;
2. Constitutes a change as defined in the "Changes" clause;
3. Causes an increase or decrease in the estimated cost of the contract or Work Assignment;
4. Alters the period of performance of the contract or Work Assignment; or
5. Changes any of the other express terms or conditions of the contract or Work Assignment.

Technical Direction will be issued in writing by the WAM, or confirmed by the WAM in writing within five (5) calendar days after oral issuance, if oral instruction provided.

### **QUALITY ASSURANCE**

Performance under this Work Assignment requires the contractor to prepare a Quality Assurance Project Plan (QAPP) to be included as part of the Work Assignment. The contractor shall submit a QAPP with its Work Plan in accordance with *EPA Requirements for Quality Assurance Project Plans (QA/R-5)* found here:

<http://www.epa.gov/QUALITY/qs-docs/r5-final.pdf>. The contractor's QAPP must be approved by the WAM and Quality Assurance Manager before Work Plan approval. Following approval of the contractor's QAPP, the contractor shall perform all tasks under this Work Assignment in accordance with the quality standards established in the QAPP.

### **SURVEY MANAGEMENT**

Performance under this Work Assignment may require the contractor to create statistical surveys, perform data collection, use questionnaires, **or perform statistical analysis of survey data**. The contractor shall perform these tasks in accordance with the *EPA Survey Management Handbook* found here: <http://www.epa.gov/oamcinc1/0710295/attach12.pdf>.

## **COMMUNICATIONS PRODUCTS**

Performance under this Work Assignment may require the contractor to develop deliverables that are considered by EPA to be “Communications Products.” If relevant, the contractor shall develop Communications Products in accordance with *EPA’s Policy and Implementation Guide for Communications Product Development and Approval* found here: <http://www.epa.gov/productreview/guide/index.html>. Additionally, if Communications Products require the use of EPA graphics, logos, or other identifiable materials, the Communications Products are further subject to the standards in *EPA’s Visual and Product Standards Graphics Manual* found here: <http://wedcor.cor.epa.gov/pages/TIM/VisualIdentity-6-19-07.pdf>.

## **EPA ORCR Quality Assurance Review Form for Contractor Work Assignments**

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-8				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000006				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			Haz waste generator				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: The purpose of this amendment is to approve contractor's work plan dated 9/30/13 for (b)(4) cost (b)(4) fee=\$40,702.23 with LOE of 468 hours. Total Ceiling for work assignment is \$110,563.92 (b)(4) Cost (b)(4) Fee) Total LOE of 1,208.										
<input type="checkbox"/> Superfund					Accounting and Appropriations Data					<input checked="" type="checkbox"/> Non-Superfund
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <span style="border: 1px solid black; padding: 2px;">22</span>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 1,208				
04/30/2012 To 04/29/2014										
This Action:						0				
Total:						1,208				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Phuc Phan						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number    703-306-1013				
						FAX Number:				
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 703-605-0509				
						FAX Number: 703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name    Eulvid Rocque						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 202-564-8316				
						FAX Number:				

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-8				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000007				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			Regulatory Reform and Streamli				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: The purpose of this amendment is to add additional LOE of 312 hours to continue work and respond to comments under Tasks 2 through 7. The new total LOE is 1520 hours. The statement of work is attached. The contractor shall submit a work plan/cost estimate reflecting the additional work. This amendment also changes the WAM to Phuc Phan and the alt.WAM to Rachel Horton.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO      22      Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
04/30/2012 To 04/29/2014										
This Action:						1,520				
Total:						1,520				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Phuc Phan						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number    703-306-1013				
						FAX Number:				
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    703-605-0509				
						FAX Number:    703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name    Eulvid Rocque						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    202-564-8316				
						FAX Number:				

## **EPA CONTRACT NUMBER EP-W-12-013**

### **Statement of Work**

Work Assignment Number: 1-08

Work Assignment Amendment Number: 7

Title: Economic Analysis and Related Support for: Improvements to the Hazardous Waste Generator Regulatory Program and Associated RCRA Work

Work Assignment Manager (WAM): Phuc Phan

Address: ERAS/ORCR/OSWER  
Mail Code 5305P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460

Telephone: (703) 306-1013  
(703) 308-5268 (front office)  
(703) 308-7903 (FAX)

Work Assignment Alternate Manager: Rachel Horton

Address: ERAS/ORCR/OSWER  
Mail Code 5305P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460

Telephone: (703) 305-0894

## **BACKGROUND:**

See the original Work Assignment.

## **PURPOSE AND SCOPE OF THIS WORK ASSIGNMENT AMENDMENT:**

The purpose of this Work Assignment (WA) Amendment is to build on work conducted under the previous WA.

The primary focus of this Amendment shall be on completing the proposed Economic Assessment (EA) document, and addressing any comments, concerns, issues, further analyses related to the EA. Once OMB clears the proposed rule, the contractor shall make the necessary changes to the proposed EA and submit the final EA.

Finally, this WA includes the preparation of emergency turnaround assessments, general supporting materials, briefings, general project coordination, and ongoing communication/outreach to the WAM.

## **WORK STATEMENT:**

### **Task 1. Work Plan, Progress Reports and Budget**

Within twenty (20) days of receipt of this work assignment amendment, the contractor shall deliver a work plan. This plan shall include a proposed level of effort, budget, schedule of tasks, and schedule of deliverables. A cost proposal shall accompany this work plan.

All data collection, assessment, and quality issues associated with this Amendment shall adhere to EPA data quality guidance and requirements, as established in EPA Order 5360.1 A2, EPA Manual 5360.A I , and OSWER's and ORCR's Quality Management Plans.

As part of the monthly progress reports for this WA, the Contractor shall provide a summary of all data collection and quality control activities conducted during each month.

No confidential business information (CBI) shall be collected or used in conjunction with this Amendment. However, proprietary data may be used following written approval from the WAM.

Deliverable(s) and Schedule:

Work Plan and Budget within allotted time frame identified above.

### **Task 2: Regulatory Support and Response to Comments on the EA**

The contractor shall continue to provide technical, cost, economic, human health and ecological benefits, and related analytical analyses and support to the ORCR proposed regulation: "Improvements to the Hazardous Waste Generator Regulatory Program". Document comments, concerns, issues or further analyses related to the EA will be provided by various offices, including OMB, the workgroup, and WAM.

Responses to comments may involve additional analyses on the methodology and the models employed in the EA. Some comments may only be editorial in nature. OMB often requires additional sensitivity analysis of the number of entities, costs and/or benefits. In addition to making editorial and numeric changes to the EA, the contractor shall assist with the preparation of briefings for OMB. The WAM may task the contractor to provide tables, bullet lists and/or to draft a short memo in response to OMB comments detailing how their comments will be handled in regard to the final EA. The contractor shall e-mail the WAM and alternate WAM the draft final EA and any spreadsheets used to support the EA.

Once OMB clears the proposed rule, the contractor shall make any necessary changes to the proposed EA and submit the final EA to the WAM.

**Deliverable(s) and Schedule:**

Upon receiving Technical Directives (TDs) from either the WAM or the alternate WAM, the deliverables under this Task shall be completed within 5 business days.

## WORK ASSIGNMENT ADDITIONAL REQUIREMENTS OFFICE OF RESOURCE CONSERVATION AND RECOVERY

The following additional terms and conditions are requirements of this task order:

### TECHNICAL DIRECTION

In accordance with EPAAR 1552 .237-71-*Technical Direction*, the WAM will provide Technical Direction during performance of this Work Assignment. Technical direction includes:

1. Instruction to the contractor that approves approaches, solutions, designs, or refinements; fills in details; completes the general description of work; shifts emphasis among work areas or tasks; and
2. Evaluation and acceptance of reports or other deliverables.

Technical Direction must be within the scope of the contract-level statement of work (SOW). The WAM does not have the authority to issue Technical Direction which:

1. Requires additional work outside the scope of the contract or Work Assignment;
2. Constitutes a change as defined in the "Changes" clause;
3. Causes an increase or decrease in the estimated cost of the contract or Work Assignment;
4. Alters the period of performance of the contract or Work Assignment; or
5. Changes any of the other express terms or conditions of the contract or
6. Work Assignment.

Technical Direction will be issued in writing by the WAM, or confirmed by the WAM in writing within five (5) calendar days after oral issuance, if oral instruction provided.

### QUALITY ASSURANCE

Performance under this Work Assignment requires the contractor to prepare a Quality Assurance Project Plan (QAPP) to be included as part of the Work Assignment. The contractor shall submit a QAPP with its Work Plan in accordance with *EPA Requirements for Quality Assurance Project Plans (QA/R-5)* found here:

<http://www.epa.gov/QUALITY/qs-docs/r5-final.pdf>. The contractor's QAPP must be approved by the WAM and Quality Assurance Manager before Work Plan approval.

Following approval of the contractor's QAPP, the contractor shall perform all tasks under this Work Assignment in accordance with the quality standards established in the QAPP.



## **SURVEY MANAGEMENT**

Performance under this Work Assignment may require the contractor to create statistical surveys, perform data collection, use questionnaires, **or perform statistical analysis of survey data.** The contractor shall perform these tasks in accordance with the *EPA Survey Management Handbook* found here: [http://www.epa.gov/oamcinc1/07\\_1\\_0295/attach12.pdf](http://www.epa.gov/oamcinc1/07_1_0295/attach12.pdf)

## **COMMUNICATIONS PRODUCTS**

Performance under this Work Assignment may require the contractor to develop deliverables that are considered by EPA to be "Communications Products." If relevant, the contractor shall develop Communications Products in accordance with *EPA's Policy and Implementation Guide for Communications Product Development and Approval* found here: <http://www.epa.gov/productreview/guide/index.html>. Additionally, if Communications Products require the use of EPA graphics, logos, or other identifiable materials, the Communications Products are further subject to the standards in *EPA's Visual and Product Standards Graphics Manual* found here: <http://www.epa.gov/pages/TIM/VisualIdentity-6-19-07.pdf>

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-8				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000008				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			HW Generator Rule RIA				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW All					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: The purpose of this amendment is to approve the Work Plan dated March 31, 2014. Cost (b)(4) fee (b)(4) total \$8,993.39. With an LOE of 89 hours. Total approve cost ceiling for this work assignment 1-08 is \$119,557.31 (cost (b)(4) fee (b)(4) Total LOE for this work assignment is 1,297 hours. The contractor is not allowed to go over approved cost ceiling.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO (Max 2)    22                      Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE: 1,520						
04/30/2012 To 04/29/2014										
This Action:				-223						
Total:				1,297						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name    Phuc Phan							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number    703-306-1013			
							FAX Number:			
Project Officer Name    Shannon Sturgeon							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 703-605-0509			
							FAX Number: 703-308-7903			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name    Eulvid Rocque							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-564-8316			
							FAX Number:			

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-9				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014 Base                      Option Period Number    1			Title of Work Assignment/SF Site Name Peer Review of IWEM 3.0				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   02/04/2014   To   04/29/2014				
Comments: The purpose of this action is to initiate WA 1-9 titled "IWEM Peer Review" with LOE of 311 hours. Taetaye Shimeles is appointed as the WAM and Tim Taylor is appointed the Alt. WAM. The statement of work is attached. The contractor shall submit a work plan/cost estimate.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <span style="border: 1px solid black; padding: 2px;">22</span>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
04/30/2012 To 04/29/2014										
This Action:						311				
Total:						311				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Taetaye Shimeles  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>						Branch/Mail Code: Phone Number    703-308-8729 FAX Number:				
Project Officer Name    Shannon Sturgeon  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>						Branch/Mail Code: Phone Number:    703-605-0509 FAX Number:    703-308-7903				
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name    Eulvid Rocque  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>						Branch/Mail Code: Phone Number:    202-564-8316 FAX Number:				

## **EPA CONTRACT NUMBER EP-W-12 -013**

### **Statement of Work**

**Work Assignment Number:** B-9

**Work Assignment Amendment Number:** 1

**Title:** External Peer Review of the Industrial Waste Management Evaluation Model (IWEM)  
Beta Version 3.0

**Work Assignment Manager (WAM):** Taetaye Shimeles

Address: ERAS/PMCAO/ORCR/OSWER  
Mail Code 5305P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460

Telephone: (703)-308-8729  
(703) 308-7903 (FAX)

**Alternate WAM:** **Zubair Saleem, Ph.D.**  
Mail Code 5305P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460  
Telephone: (703)308-0467

### **BACKGROUND:**

The Industrial Waste Management Evaluation Model (IWEM), as developed by the EPA provides a tiered analysis that helps to determine the most appropriate waste management unit (WMU) design to minimize or avoid adverse ground water impacts by evaluating one or more types of liners, the hydrologic conditions of the site, and the toxicity and expected leachate concentrations of the anticipated waste constituents. The previous two versions (Version 1.0 and 2.0) had undergone external peer reviews in 2002 and 2008, respectively. For the IWEM Beta Version 3.0, an additional source module was added to evaluate the potential for contaminants release from drains and embankments along roadways.

### **PURPOSE AND SCOPE OF THIS WORK ASSIGNMENT:**

The purpose of this work assignment amendment is to de-scope the remainder of work in the original work assignment and any unused level-of-efforts.

**Task 1: Work Plan, Progress Reports and Budget**

This task of preparing work plan is completed based on the requirements specified under the original work assignment. No more additional work will be completed under this task at this time and the level of effort ceiling is reduced by 3 hours.

**Task 2: Identifying and Selecting Peer Reviewers**

IWEM 3.0 Beta is still under development. The task of identifying and selecting peer reviewers will not be completed at this time. The level of effort ceiling will be reduced by 40 hours.

**Task 3: Development of Peer Review Material**

IWEM 3.0 Beta is still under development. The task of developing of peer review material will not be completed at this time. The level of effort ceiling will be reduced by 15.5 hours.

**Task 4: Conduct Peer Review, Compile Comments and Prepare a Peer Review Report**

IWEM 3.0 Beta is still under development. The task of conducting peer review, compiling peer review comment and preparing a peer review report will not be completed at this time. The level of effort will be ceiling reduced by 216 hours.

<b>IWEM Beta Version 3.0 Peer Review Schedule</b>	
<b>Items</b>	<b>Due Date to EPA</b>
<b>Task 1:</b> Work Plan	Completed
<b>Task 2:</b> No more work will be completed at this time.	Not Applicable
<b>Task 3:</b> No more work will be completed at this time.	Not Applicable
<b>Task 4:</b> No more work will be completed at this time.	Not Applicable

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-9				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			Peer Review of IWEM v3.0				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW 4 sections					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   02/04/2014   To   04/29/2014					
Comments: The purpose of this amendment is to approve the contractor's work plan/cost estimate dated 02/19/2014 with LOE of 311 hours and \$39,913.94 (b)(4) cost (b)(4) fee). The contractor is note allow to go over the cost ceiling approved for this work assignment without the Contracting Officer's approval.										
<input type="checkbox"/> Superfund					Accounting and Appropriations Data					<input checked="" type="checkbox"/> Non-Superfund
Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
SFO      22 (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 311				
04/30/2012   To   04/29/2014										
This Action:						0				
Total:						311				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Taetaye Shimeles						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number    703-308-8729				
						FAX Number:				
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    703-605-0509				
						FAX Number:    703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name    Eulvid Rocque						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    202-564-8316				
						FAX Number:				

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-9				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000002				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014 Base                      Option Period Number    1			Title of Work Assignment/SF Site Name Peer Review of IWEM v3.0				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW 4					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   02/04/2014   To   04/29/2014				
Comments: The purpose of this amendment is to de-scope/reduce LOE in the amount of 219 from work assignment 1-9. The new total LOE amount is 92 hours. The contractor shall submit a cost estimate and work plan in response to request.										
<input type="checkbox"/> Superfund    Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <span style="border: 1px solid black; padding: 2px;">22</span>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
04/30/2012 To 04/29/2014										
This Action:						92				
Total:						92				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Taetaye Shimeles						Branch/Mail Code:				
_____ (Signature)    (Date)						Phone Number    703-308-8729				
						FAX Number:				
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)    (Date)						Phone Number: 703-605-0509				
						FAX Number: 703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)    (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name    Eulvid Rocque						Branch/Mail Code:				
_____ (Signature)    (Date)						Phone Number: 202-564-8316				
						FAX Number:				

## **EPA CONTRACT NUMBER EP-W-12 -013**

### **Statement of Work**

**Work Assignment Number:** B-9

**Work Assignment Amendment Number:** 1

**Title:** External Peer Review of the Industrial Waste Management Evaluation Model (IWEM)  
Beta Version 3.0

**Work Assignment Manager (WAM):** Taetaye Shimeles

Address: ERAS/PMCAO/ORCR/OSWER  
Mail Code 5305P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460

Telephone: (703)-308-8729  
(703) 308-7903 (FAX)

**Alternate WAM:** **Zubair Saleem, Ph.D.**  
Mail Code 5305P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460  
Telephone: (703)308-0467

### **BACKGROUND:**

The Industrial Waste Management Evaluation Model (IWEM), as developed by the EPA provides a tiered analysis that helps to determine the most appropriate waste management unit (WMU) design to minimize or avoid adverse ground water impacts by evaluating one or more types of liners, the hydrologic conditions of the site, and the toxicity and expected leachate concentrations of the anticipated waste constituents. The previous two versions (Version 1.0 and 2.0) had undergone external peer reviews in 2002 and 2008, respectively. For the IWEM Beta Version 3.0, an additional source module was added to evaluate the potential for contaminants release from drains and embankments along roadways.

### **PURPOSE AND SCOPE OF THIS WORK ASSIGNMENT:**

The purpose of this work assignment amendment is to de-scope the remainder of work in the original work assignment and any unused level-of-efforts.



**Task 1: Work Plan, Progress Reports and Budget**

This task of preparing work plan is completed based on the requirements specified under the original work assignment. No more additional work will be completed under this task at this time and the level of effort ceiling is reduced by 3 hours.

**Task 2: Identifying and Selecting Peer Reviewers**

IWEM 3.0 Beta is still under development. The task of identifying and selecting peer reviewers will not be completed at this time. The level of effort ceiling will be reduced by 40 hours.

**Task 3: Development of Peer Review Material**

IWEM 3.0 Beta is still under development. The task of developing of peer review material will not be completed at this time. The level of effort ceiling will be reduced by 15.5 hours.

**Task 4: Conduct Peer Review, Compile Comments and Prepare a Peer Review Report**

IWEM 3.0 Beta is still under development. The task of conducting peer review, compiling peer review comment and preparing a peer review report will not be completed at this time. The level of effort will be ceiling reduced by 216 hours.

<b>IWEM Beta Version 3.0 Peer Review Schedule</b>	
<b>Items</b>	<b>Due Date to EPA</b>
<b>Task 1:</b> Work Plan	Completed
<b>Task 2:</b> No more work will be completed at this time.	Not Applicable
<b>Task 3:</b> No more work will be completed at this time.	Not Applicable
<b>Task 4:</b> No more work will be completed at this time.	Not Applicable

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-9				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000003				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			Peer Review of IWEM v3.0				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW 4 sections					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   02/04/2014   To   04/29/2014					
Comments: The purpose of this amendment is to approve the contractors work plan/cost estimate dated 3/20/14 which de-scopes/reduce amendment 0001 approving contractor's work plan dated on 02/19/14. The new cost (b)(4) fee (b)(4) which totals \$10,536.79 with LOE at 92. The contractor is not allowed to go over the new approved cost ceiling with out approval from the Contracting Officer.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
SFO    22 (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 92				
04/30/2012   To   04/29/2014										
This Action:						0				
Total:						92				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Taetaye Shimeles						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number    703-308-8729				
						FAX Number:				
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    703-605-0509				
						FAX Number:    703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name    Eulvid Rocque						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    202-564-8316				
						FAX Number:				

Work Assignment Form, (WebForms v1.0)

Contract # : EPW 12 013  
**Statement of Work WA 1-10**

**Title:** eEnterprise Benefits Analysis in OSWER

**Contracting Officer's Representative:** Name: David Nicholas  
202-566-1927  
Address: OSWER/PARMS (5103t) Fax No: 202 566-1933  
1200 Pennsylvania, NW, Washington, DC 20460

**Alternate Contracting Officer Representative:** Nick Hilosky  
202-566-2924  
Address: OSWER/PARMS (5103t) Fax No: 202 564-0034  
1200 Pennsylvania, NW, Washington, DC 20460

**BACKGROUND, PURPOSE AND SCOPE**

The Government Performance and Results Act (GPRA) of 1993 and GPRA Modernization Act of 2010 hold all federal agencies accountable for how they use their resources to achieve results. It requires: (1) strategic planning, (2) the development of measures to assess program performance and progress, (3) that information is reported to the public, and (4) that agencies develop a schedule of planned and completed program evaluations.

Assessing the benefits of modernizing our national system of environmental protection, in coordination with our state, local, and tribal partners is an essential component to understanding our progress towards agencywide GPRA goals and objectives. The initiative to modernize the way environmental results are monitored, reported and assessed is known as eEnterprise.

eEnterprise is an initiative between States and EPA to improve environmental outcomes through maximizing the use of advanced monitoring and technology; optimizing program operations; increasing transparency; and to dramatically enhance service to the regulated community and the public. This initiative will expand the use of advance monitoring technology in research, regulations, and inspections so that government, regulated entities and the public will have better information on sources of pollutants and environmental conditions. This statement of work covers the support needed to assess the benefits of taking this new approach and describe the positive impacts and costs in both quantitative and qualitative terms.

To ensure state perspectives are included, EPA and the Environmental Council of States (ECOS) formed a Working Group in June 2012 to collaboratively pursue electronic reporting between regulated entities and environmental government regulators. However, electronic reporting is only one part of a much larger set of opportunities and challenges that need to be addressed as we seek to modernize our approach to environmental protection using advances in both emissions/pollutant monitoring and information technology. Further, on December 5, 2012 the President of ECOS and the US EPA Deputy Administrator signed a joint

statement confirming the commitment of the States and EPA to collaboratively govern eEnterprise.

In this larger initiative, called eEnterprise, regulated entities could electronically conduct business transactions with the government: submitting permit applications, updating financial assurance documentation, and reporting emission and pollutant discharge data. The tools/systems that support this should be “smart” to help entities understand their regulatory obligations, eliminate duplicative entry of information and efficiently support electronic signature requirements consistent with proposed EPA and state regulations. Quantifying and describing these beneficial impacts is a necessary step in managing the eEnterprise initiative and will form the core of this statement of work’s tasks.

This initiative is also based on using advances in emissions/pollutant monitoring technology to expand the ability of the government, regulated sources and the public to detect and measure pollutant discharges/emissions and environmental conditions. Pollutants that were largely “invisible” will not only become visible, but information on them will be electronically exchanged and used to more effectively prevent, reduce and manage pollution. Characterizing the benefits to communities and stakeholder groups that stand to gain from these advances will also be an important task.

The COR is authorized to provide written technical direction to the Contractor (with a courtesy copy to the Contracting Officer and Project COR) to clarify requirements already specified in this Statement of Work.

Work on this Call Order shall begin on date of award and end July 22, 2014. Work under this Call Order applies to task IV of the BPA SOW.

#### **TASK 1: Analysis of OSWER Program Reporting Burden**

- 1-1 The contractor shall use existing analyses to assess the reporting requirements of all OSWER programs derived from existing regulations and identify all CFR citations in a summary report, arranged by program subheading.
- 1-2 The contractor shall develop an accompanying analysis of the nature of these reporting requirements and the disposition of the information required by each regulation; whether the regulated entity has the option to report electronically, or to submit paper, and where the information is housed; at the facility or sent to EPA regional offices, or online via submission to an EPA-managed reporting system.
- 1-3 The contractor shall briefly describe the scope of work necessary to conduct an assessment of the use of the information collected via these regulations in significant enforcement settlements against responsible parties. This analysis shall be incorporated in the report described in 1-2.

#### **Deliverables and Schedule Under Task 1**

- 1-1 Summary Report of Reporting Requirements
  - a. Draft report 14 days after the COR sends technical direction
  - b. Final report 7 days after COR sends review comments
- 1-2 Analysis of Reporting Requirements
  - a. Draft report 21 days after the COR sends technical direction
  - b. Final report 7 days after COR sends review comments
- 1-3 Description of Reporting Requirements in Enforcement Action
  - a. Draft report 21 days after the COR sends technical direction
  - b. Final report 7 days after COR sends review comments

## **TASK 2: Business Process Flow Mapping for Lean Analysis**

- 2-1 In consultation with the COR, the contractor shall develop charts and business process flowcharts for candidate areas for Lean analysis to identify procedural reforms to increase efficiency. Candidate processes may cross programmatic lines and involve coordination with regions and other program offices.

### **Deliverables and Schedule Under Task 2**

- 2-1 Business Process Flow Mapping
  - a. Draft flowchart 21 days after the COR sends technical direction
  - b. Final flowchart and report 7 days after COR sends review comments

## **TASK 3: Supporting FY15 eEnterprise Initiatives**

- 3-1 The contractor shall provide analytical support via brief assessments (2-3 pages) to potential OSWER projects under the FY15 eEnterprise initiative across all waste management and cleanup programs. The contractor shall analyze existing and new project proposals to identify the scope of any necessary regulatory changes, new information collection burdens and costs to regulated community. The contractor shall also examine opportunities to implement user fees in any potential eEnterprise project.

### **Deliverables and Schedule Under Task 3**

- 3-1 Project Assessments
  - a. Draft assessments 5 days after the COR sends technical direction
  - b. Final report 5 days after COR sends review comments

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-10				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			E-Enterprise Benefits				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: The purpose of this amendment is to approve the contractor's work plan/cost estimate dated August 12, 2013 for a LOE of 692 hours and \$74,986.14 (Cost <span style="border: 1px solid black; padding: 0 20px;">(b)(4)</span> Fee <span style="border: 1px solid black; padding: 0 20px;">(b)(4)</span>										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <span style="border: 1px solid black; padding: 0 10px;">22</span> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 692				
04/30/2012   To   04/29/2014										
This Action:						0				
Total:						692				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name   David Nicholas						Branch/Mail Code:				
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"><span>(Signature)</span><span>(Date)</span></div>						Phone Number   202-566-1927				
						FAX Number:				
Project Officer Name   Shannon Sturgeon						Branch/Mail Code:				
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"><span>(Signature)</span><span>(Date)</span></div>						Phone Number: 703-605-0509				
						FAX Number: 703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"><span>(Signature)</span><span>(Date)</span></div>						Phone Number:				
						FAX Number:				
Contracting Official Name   Eulvid Rocque						Branch/Mail Code:				
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="display: flex; justify-content: space-between;"><span>(Signature)</span><span>(Date)</span></div>						Phone Number: 202-564-8316				
						FAX Number:				

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-11				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014 Base                      Option Period Number    1			Title of Work Assignment/SF Site Name WA #1-11				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   04/30/2013   To   04/29/2014				
Comments: This action initiates WA 1-11, titled "Identification of Non-Hazardous Secondary Materials (NSHMs) That ae Solid Waste, Contaminant Analyses and Related Work" with a LOE of 505 hours. Tab Tesnau is appointed as the WAM under this work assignment; Tracy Atagi is appointed as the Alt. WAM. The SOW is attached. The contractor shall submit a work plan/cost estimate.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
SFO <span style="border: 1px solid black; padding: 2px;">22</span> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
04/30/2012 To 04/29/2014										
This Action:						505				
Total:						505				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Tab Tesnau						Branch/Mail Code:				
_____ (Signature)                      _____ (Date)						Phone Number    703-605-0636				
						FAX Number:				
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      _____ (Date)						Phone Number:    703-605-0509				
						FAX Number:    703-308-7903				
Other Agency Official Name    Tab Tesnau						Branch/Mail Code:				
_____ (Signature)                      _____ (Date)						Phone Number:    703-605-0636				
						FAX Number:				
Contracting Official Name    Christie Deskiewicz						Branch/Mail Code:				
_____ (Signature)                      _____ (Date)						Phone Number:    202-564-3316				
						FAX Number:				



## **EPA CONTRACT NUMBER EP-W-12-013**

### **Statement of Work**

Work Assignment Number: 1-11

Work Assignment Amendment Number:

Title: **Identification of Non-Hazardous Secondary Materials (NSHMs) That Are Solid Waste, Contaminant Analyses and Related Work**

Work Assignment Manager (WAM): Tabitha Tesnau

Address: MRWMD/ORCR/OSWER  
Mail Code 5303P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460

Telephone: (703)-308-0508  
(703) 308-5268 (front office)  
(703) 308-7903 (FAX)

### **BACKGROUND:**

The United States Court of Appeals for the District of Columbia Circuit vacated and remanded two U.S. Environmental Protection Agency (EPA or the Agency) rules promulgated under the CAA — The Commercial and Industrial Solid Waste Incineration definitions rule (“Definitions Rule”), issued under CAA section 129, and the Industrial Boilers Maximum Achievable Control Technology (MACT) standards rule (“Boilers Rule”), issued under CAA section 112. The court concluded that EPA erred by excluding units that combust solid waste for the purposes of energy recovery from the Definitions Rule and including such units in the Boilers Rule. In response to the court’s decision, EPA is preparing to establish new standards under CAA sections 112 and 129 for the various units subject to each section.

As part of the development of new standards under CAA sections 112 and 129, EPA must establish under RCRA, what non-hazardous secondary materials constitute “solid waste.” This is necessary because, under the court’s decision, any unit combusting any “solid waste” must be regulated as a “solid waste incineration unit,” regardless of the function of the combustion device. If a non-hazardous material is not a “solid waste” under RCRA and such material is burned for fuel or used as an ingredient in a combustion manufacturing process, then under the court’s decision, the combustion unit would properly be regulated pursuant to section 112 of the CAA. Alternatively, if such material is a “solid waste” under RCRA, and is burned for fuel value or used as an ingredient in a manufacturing process and such ingredient is combusted, then the unit must be regulated under section 129 of the CAA.

In March, 2011, the Final Rule: Identification of Non Hazardous Secondary materials that are Solid Waste was signed. A final rule identifying targeted revisions to the March 2011 rule was issued in February 2013. ORCR is currently in the process of implementing those rules.

### **SCOPE OF THIS WORK ASSIGNMENT:**

The purpose of this work assignment is to provide for necessary analytical and other technical support for implementation of the final rule. This Work Assignment may also include contaminant data analysis, and data quality assessment. Project coordination, attendance at Agency and public meetings, project communication, and outreach are also within the scope of this work assignment.

### **WORK STATEMENT:**

#### Task 1. Work Plan, Progress Reports and Budget

Within twenty (20) days of receipt of this work assignment, the contractor shall deliver a work plan. This plan shall include a proposed level of effort, budget, schedule of tasks, and schedule of deliverables. A cost proposal shall accompany this work plan.

All data collection, assessment, and quality issues associated with this Work Assignment shall adhere to EPA data quality guidance and requirements, as established in EPA Order 5360.1A2, EPA Manual 5360.A1, and OSWER's and ORCR's Quality Management Plans. See: [http://www.epa.gov/quality/qa\\_docs.html](http://www.epa.gov/quality/qa_docs.html)

As part of the monthly progress reports for this Work Assignment, the Contractor shall provide a summary of all data quality activities conducted during each month.

No confidential business information (CBI) shall be collected or used under this Work Assignment. However, proprietary data may be used following written approval from the COR.

Contractor travel is authorized under this Work Assignment. The contractor shall budget for no more than two overnight trips for up to two persons, round trip from Boston to Washington, D.C.

#### Deliverable(s) and Schedule:

Work Plan and Budget within allotted time frame identified above.

#### Task 2. General Analytical Support – Contaminant Comparison

The project addressed under this Work Assignment Amendment: **Identification of Non-Hazardous Secondary Materials That Are Solid Waste Analyses**, is an action that requires a

wide range of analytical support including evaluation of contaminant sampling data from NHSMs, comparison of the contaminant concentration levels in those NHSMs to levels in traditional fuels including coal, oil, biomass and natural gas. In the follow-up analytical support to issuance of the rule, the Agency also anticipates the need to assess heretofore unknown issues, materials, or industries that may be impacted by the action. These assessments may require data collection and assessment, new research and analysis, or related supporting activities.

An understanding of the contaminant comparison methodologies described in the preamble to the Feb 7, 2013 NHSM final rule (78 FR 9111) is expected. In addition, part of this task is to build on the framework in the preamble and to be able to apply contaminant comparisons on a case-by-case basis. Novel issues will have to be resolved pertaining to contaminant comparison methods acceptable for different instances. This includes an understanding of when it is acceptable to group contaminants, an understanding of acceptable statistics when comparing ranges, etc.

Under this Task, the contractor shall be prepared to assess unexpected issues and provide research, support, and documentation, as identified through a Technical Directive (TD). This Task also includes related support needs such as scoping papers, summary papers, and briefings.

All work under this Task shall be initiated through a Technical Directive (TD). The contractor shall budget for approximately six (6) TDs under this Task.

#### Deliverable(s) and Schedule:

There shall be separate draft and final deliverables for each Technical Directive received under this task. These deliverables shall be in e-mail, memo, paper, or briefing format, as appropriate for the material and requirements. Tables and charts shall be included in all deliverables as appropriate to ensure presentation clarity and ease of understanding. (All charts shall be in an editable format.) The draft deliverables shall be due to the COR no later than ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information. The final deliverable(s) shall be due to the COR no later than five (5) Agency working days following contractor receipt of all written COR comments on the draft document(s).

[illegible]

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-11				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			NHSMs Analysis, related work				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: The purpose of this amendment is to approve the contractor's work plan/cost estimate dated August 5, 2013 for a LOE of 505 hours and \$60,673.37 (b)(4) cost (b)(4) fee). The ceiling for this WA shall not exceed \$50,000 until further notice from the contracting officer.										
<input type="checkbox"/> Superfund					Accounting and Appropriations Data					<input checked="" type="checkbox"/> Non-Superfund
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO      22 (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 505				
04/30/2012   To   04/29/2014										
This Action:						0				
Total:						505				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Tab Tesnau						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number    703-605-0636				
						FAX Number:				
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 703-605-0509				
						FAX Number: 703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name    Christie Deskiewicz						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 202-564-3316				
						FAX Number:				

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-11				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000002				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			1-11 NSHMs Analyses				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: The purpose of this amendment is to appoint Jesse Miller as the WAM and to reduce the LOE on work assignment 1-11 by 230 hours for a total LOE of 275 hours. The statement of work is attached. The contractor shall submit a work plan/cost estimate for this reduction.										
<input type="checkbox"/> Superfund					Accounting and Appropriations Data					<input checked="" type="checkbox"/> Non-Superfund
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO      22 (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
04/30/2012 To 04/29/2014										
This Action:						275				
Total:						275				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Jesse Miller						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number    703-308-1180				
						FAX Number:				
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    703-605-0509				
						FAX Number:    703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name    Eulvid Rocque						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    202-564-8316				
						FAX Number:				

## **EPA CONTRACT NUMBER EP-W-12-013**

### **Statement of Work**

Work Assignment Number: 1-11

Work Assignment Amendment Number: 2

Title: **Identification of Non-Hazardous Secondary Materials (NSHMs) That Are Solid Waste, Contaminant Analyses, and Related Work**

Work Assignment Manager (WAM):

Jesse Miller

Address:

OSWER/ORCR /MRWMD  
Mail Code 5304P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460

Telephone:

(703)-308-1180  
(703) 308-5268 (front office)  
(703) 308-7903 (FAX)

### **BACKGROUND:**

The United States Court of Appeals for the District of Columbia Circuit vacated and remanded two U.S. Environmental Protection Agency (EPA or the Agency) rules promulgated under the CAA — The Commercial and Industrial Solid Waste Incineration definitions rule (“Definitions Rule”), issued under CAA section 129, and the Industrial Boilers Maximum Achievable Control Technology (MACT) standards rule (“Boilers Rule”), issued under CAA section 112. The court concluded that EPA erred by excluding units that combust solid waste for the purposes of energy recovery from the Definitions Rule and including such units in the Boilers Rule. In response to the court’s decision, EPA is preparing to establish new standards under CAA sections 112 and 129 for the various units subject to each section.

As part of the development of new standards under CAA sections 112 and 129, EPA must establish under RCRA, what non-hazardous secondary materials constitute “solid waste.” This is necessary because, under the court’s decision, any unit combusting any “solid waste” must be regulated as a “solid waste incineration unit,” regardless of the function of the combustion device. If a non-hazardous material is not a “solid waste” under RCRA and such material is burned for fuel or used as an ingredient in a combustion manufacturing process, then under the court’s decision, the combustion unit would properly be regulated pursuant to section 112 of the CAA. Alternatively, if such material is a “solid waste” under RCRA, and is burned for fuel value or used as an ingredient in a manufacturing process and such ingredient is combusted, then the unit must be regulated under section 129 of the CAA.

In March, 2011, the Final Rule: Identification of Non Hazardous Secondary materials that are Solid Waste was signed. A final rule identifying targeted revisions to the March 2011 rule was issued in February 2013. ORCR is currently in the process of implementing those rules.

### **SCOPE OF THIS WORK ASSIGNMENT:**

The hours in this work assignment are being reduced.

The purpose of this work assignment is to provide for necessary analytical and other technical support for implementation of the final rule. This Work Assignment may also include contaminant data analysis, and data quality assessment. Project coordination, attendance at Agency and public meetings, project communication, and outreach are also within the scope of this work assignment.

### **WORK STATEMENT:**

#### Task 1. Work Plan, Progress Reports and Budget

Refer to the initial Statement of Work

#### Task 2. General Analytical Support – Contaminant Comparison

The text in *italics* is being de-scoped from this Task 2.

The project addressed under this Work Assignment Amendment: **Identification of Non-Hazardous Secondary Materials That Are Solid Waste Analyses**, is an action that requires a wide range of analytical support including evaluation of contaminant sampling data from NHSMs, comparison of the contaminant concentration levels in those NHSMs to levels in traditional fuels including coal, oil, biomass and natural gas. In the follow-up analytical support to issuance of the rule, the Agency also anticipates the need to assess heretofore unknown issues, materials, or industries that may be impacted by the action. These assessments may require data collection and assessment, new research and analysis, or related supporting activities.

An understanding of the contaminant comparison methodologies described in the preamble to the Feb 7, 2013 NHSM final rule (78 FR 9111) is expected. In addition, part of this task is to build on the framework in the preamble and to be able to apply contaminant comparisons on a case-by-case basis. Novel issues will have to be resolved pertaining to contaminant comparison methods acceptable for different instances. This includes an understanding of when it is acceptable to group contaminants, an understanding of acceptable statistics when comparing ranges, etc.

Under this Task, the contractor shall be prepared to assess unexpected issues and provide research, support, and documentation, as identified through a Technical Directive (TD). This Task also includes related support needs such as scoping papers, summary papers, and briefings.

*This task may include a summary of NHSM rulemaking comments, a categorization of NHSM*



*rulemaking comments, and development of response to those comments (integrating EPA responses as appropriate into a response package).*

*All work under this Task shall be initiated through a Technical Directive (TD). The contractor shall budget for one (1) TD under this Task.*

Deliverable(s) and Schedule:

There shall be a separate draft and final deliverable for the Technical Directive received under this task. These deliverables shall be in e-mail, memo, paper, or briefing format, as appropriate for the material and requirements. Tables and charts shall be included as appropriate to ensure presentation clarity and ease of understanding. (All charts shall be in an editable format.) The draft deliverables shall be due to the COR no later than ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information. The final deliverable(s) shall be due to the COR no later than five (5) Agency working days following contractor receipt of all written COR comments on the draft document(s).

[illegible]

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-11				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000003				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014 Base                      Option Period Number    1			Title of Work Assignment/SF Site Name NSHMS Analyses				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   04/30/2013   To   04/29/2014				
Comments: The purpose of this amendment is to add 230 LOE to Work Assignment 1-11. New total LOE for this WA is 505 LOE. The contractor shall submit a revise work plan and cost estimate as it relates to the subject matter.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <span style="border: 1px solid black; padding: 2px;">22</span>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE: 275						
04/30/2012 To 04/29/2014										
This Action:				230						
Total:				505						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name    Jesse Miller							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="text-align: center;">(Signature)</div>							Phone Number    703-308-1180			
							FAX Number:			
Project Officer Name    Shannon Sturgeon							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="text-align: center;">(Signature)</div>							Phone Number:    703-605-0509			
							FAX Number:    703-308-7903			
Other Agency Official Name							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="text-align: center;">(Signature)</div>							Phone Number:			
							FAX Number:			
Contracting Official Name    Eulvid Rocque							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="text-align: center;">(Signature)</div>							Phone Number:    202-564-8316			
							FAX Number:			

## **EPA CONTRACT NUMBER EP-W-12-013**

### **Statement of Work**

Work Assignment Number: 1-11

Work Assignment Amendment Number: 3

Title: **Identification of Non-Hazardous Secondary Materials (NSHMs) That Are Solid Waste, Contaminant Analyses, and Related Work**

Work Assignment Manager (WAM):

Jesse Miller

Address:

OSWER/ORCR /MRWMD  
Mail Code 5304P  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460

Telephone:

(703)-308-1180  
(703) 308-5268 (front office)  
(703) 308-7903 (FAX)

### **BACKGROUND:**

The United States Court of Appeals for the District of Columbia Circuit vacated and remanded two U.S. Environmental Protection Agency (EPA or the Agency) rules promulgated under the CAA — The Commercial and Industrial Solid Waste Incineration definitions rule (“Definitions Rule”), issued under CAA section 129, and the Industrial Boilers Maximum Achievable Control Technology (MACT) standards rule (“Boilers Rule”), issued under CAA section 112. The court concluded that EPA erred by excluding units that combust solid waste for the purposes of energy recovery from the Definitions Rule and including such units in the Boilers Rule. In response to the court’s decision, EPA is preparing to establish new standards under CAA sections 112 and 129 for the various units subject to each section.

As part of the development of new standards under CAA sections 112 and 129, EPA must establish under RCRA, what non-hazardous secondary materials constitute “solid waste.” This is necessary because, under the court’s decision, any unit combusting any “solid waste” must be regulated as a “solid waste incineration unit,” regardless of the function of the combustion device. If a non-hazardous material is not a “solid waste” under RCRA and such material is burned for fuel or used as an ingredient in a combustion manufacturing process, then under the court’s decision, the combustion unit would properly be regulated pursuant to section 112 of the CAA. Alternatively, if such material is a “solid waste” under RCRA, and is burned for fuel value or used as an ingredient in a manufacturing process and such ingredient is combusted, then the unit must be regulated under section 129 of the CAA.

In March, 2011, the Final Rule: Identification of Non Hazardous Secondary materials that are Solid Waste was signed. A final rule identifying targeted revisions to the March 2011 rule was issued in February 2013. ORCR is currently in the process of implementing those rules.

### **SCOPE OF THIS WORK ASSIGNMENT:**

The hours in this work assignment are being added back from the most recent descope.

The purpose of this work assignment is to provide for necessary analytical and other technical support for implementation of the final rule. This Work Assignment may also include contaminant data analysis, and data quality assessment. Project coordination, attendance at Agency and public meetings, project communication, and outreach are also within the scope of this work assignment.

### **WORK STATEMENT:**

#### Task 1. Work Plan, Progress Reports and Budget

Refer to the initial Statement of Work

#### Task 2. General Analytical Support – Contaminant Comparison

The following text in *italics* is being de-scoped.

The project addressed under this Work Assignment Amendment: **Identification of Non-Hazardous Secondary Materials That Are Solid Waste Analyses**, is an action that requires a wide range of analytical support including evaluation of contaminant sampling data from NHSMs, comparison of the contaminant concentration levels in those NHSMs to levels in traditional fuels including coal, oil, biomass and natural gas. In the follow-up analytical support to issuance of the rule, the Agency also anticipates the need to assess heretofore unknown issues, materials, or industries that may be impacted by the action. These assessments may require data collection and assessment, new research and analysis, or related supporting activities.

An understanding of the contaminant comparison methodologies described in the preamble to the Feb 7, 2013 NHSM final rule (78 FR 9111) is expected. In addition, part of this task is to build on the framework in the preamble and to be able to apply contaminant comparisons on a case-by-case basis. Novel issues will have to be resolved pertaining to contaminant comparison methods acceptable for different instances. This includes an understanding of when it is acceptable to group contaminants, an understanding of acceptable statistics when comparing ranges, etc.

Under this Task, the contractor shall be prepared to assess unexpected issues and provide research, support, and documentation, as identified through a Technical Directive (TD). This Task also includes related support needs such as scoping papers, summary papers, and briefings.

This task may include a summary of NHSM rulemaking comments, a categorization of NHSM

rulemaking comments, and development of response to those comments (integrating EPA responses as appropriate into a response package).

*All work under this Task shall be initiated through a Technical Directive (TD). The contractor shall budget for one (1) TD under this Task.*

The contractor has spent 281 hours through March 16, 2014, and the contractor anticipates spending the rest of the 224 hours through the end of April.

Deliverable(s) and Schedule:

There shall be a separate draft and final deliverable for the Technical Directive received under this task. These deliverables shall be in e-mail, memo, paper, or briefing format, as appropriate for the material and requirements. Tables and charts shall be included as appropriate to ensure presentation clarity and ease of understanding. (All charts shall be in an editable format.) The draft deliverables shall be due to the COR no later than ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information. The final deliverable(s) shall be due to the COR no later than five (5) Agency working days following contractor receipt of all written COR comments on the draft document(s).

[illegible]

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-11				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000004				
Contract Number EP-W-12-013			Contract Period   04/30/2013   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			1-11				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2013   To   04/29/2014					
Comments: The purpose of this amendment is to approve the contractor's previously approved work plan/cost estimate for work assignment 1-11 dated August 6, 2013 for a LOE of 505 hours and \$60,673.37 <u>(b)(4)</u> cost <u>(b)(4)</u> fee). The contractor is not allowed to go over this approved cost ceiling without approval from the contracting officer.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <span style="border: 1px solid black; padding: 2px;">22</span> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE:						
04/30/2013   To   04/29/2014				505						
This Action:				0						
Total:				505						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name    Jesse Miller						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number    703-308-1180				
						FAX Number:				
Project Officer Name    Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    703-605-0509				
						FAX Number:    703-308-7903				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name    Eulvid Rocque						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number:    202-564-8316				
						FAX Number:				



<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-12				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014 Base                      Option Period Number    1			Title of Work Assignment/SF Site Name Haz Waste Exp/Imp RIA				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   04/30/2012   To   04/29/2014				
Comments: This action initiates WA 1-12, titled "Hazardous Waste Export-Import Revisions Rule RIA" with an LOE of 950 hours. Chris McMinimy is appointed as the WAM under this work assignment. Lyn Luben is appointed as the Alt. WAM. The contractor shall submit a work plan/cost estimate using the SOW attached.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <span style="border: 1px solid black; padding: 2px;">22</span> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
04/30/2012 To 04/29/2014										
This Action:						950				
Total:						950				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:		LOE:				
Cumulative Approved:				Cost/Fee:		LOE:				
Work Assignment Manager Name   Chris McMinimy						Branch/Mail Code:				
_____ (Signature)                      _____ (Date)						Phone Number   703-308-0105				
						FAX Number:				
Project Officer Name   Shannon Sturgeon						Branch/Mail Code:				
_____ (Signature)                      _____ (Date)						Phone Number: 703-605-0509				
						FAX Number: 703-308-7903				
Other Agency Official Name   Chris McMinimy						Branch/Mail Code:				
_____ (Signature)                      _____ (Date)						Phone Number: 703-308-0105				
						FAX Number:				
Contracting Official Name   Christie Deskiewicz						Branch/Mail Code:				
_____ (Signature)                      _____ (Date)						Phone Number: 202-564-3316				
						FAX Number:				

## Statement of Work

15 July, 2013

Project Title: Regulatory Impact Analysis (RIA) for EPA's Hazardous Waste  
Export-Import Revisions Rule  
Contract No.: EP-W-12-013  
Work Assignment No.: 1-12  
Works Assignment Manger (COTR): Chris McMinimy, Economist  
EPA Office of Resource Conservation & Recovery (ORCR)  
703-308-0105  
Alt COTR: Lyn D Luben, Economist  
EPA Office of Resource Conservation & Recovery (ORCR)  
703-308-0508  
Period of Performance: CO signature through April 29, 2014.

### I. Introduction

EPA is revising hazardous waste export-import related requirements at 40 CFR Part 262, Part 263, Part 264, and Part 265, to achieve the following 3 goals: 1) be more consistent with OECD requirements, 2) allow electronic submittal of export notices and annual reports, and 3) enable electronic validation of hazardous waste export shipments. A description of each of these respective changes can be found below.

EPA currently regulates exports of hazardous waste under 40 CFR Part 262 Subparts E and H, depending on the waste type, the final destination country, and whether the waste will be disposed of or recycled. Regulations under Subpart H only apply to shipments of hazardous waste exported for the purpose of recovery to countries other than Canada or Mexico that belong to the Organization for Economic Cooperation and Development (OECD). The requirements under Subpart H are more stringent than the requirements under Subpart E because among other things, Subpart H requires that:

- 1) export shipments be accompanied by an OECD movement document, an international tracking document similar to a RCRA Hazardous Waste Manifest,
- 2) a contract or equivalent legal arrangements must be in place between the exporter and receiving facility before shipments occur,
- 3) the receiving facility must send a *Certificate of Recovery*, which states that the received waste has been recovered in the method agreed upon in the contract, to the exporter, the exporting country and the importing country, and
- 4) if a waste export cannot be completed in accordance with the terms of the contract, and alternative arrangements cannot be made, then the exporter must ensure the waste is returned to the US within 90 days from the date the country of transit or import notifies EPA of the need to return the shipment.

EPA is proposing to revise the existing standards at Subpart E to more closely match the more stringent existing standards at Subpart H. EPA is making these changes in part due to a report by the Commission for Environmental Cooperation (CEC), a North American environmental intergovernmental organization, which found that significant amounts of RCRA hazardous waste spent lead-acid batteries (SLABs) were shipped in 2011 to 47 countries for which no record of consent from the receiving country can be found, and that significant discrepancies between EPA and Census Bureau figures for SLAB exports exist. EPA believes that applying the relevant requirements of Subpart H to all exports of hazardous waste will help to address the CEC report's findings. To minimize burden, EPA is considering proposing to allow use of the Canadian manifest in lieu of the OECD movement document for export shipments to Canada, as Canadian requirements currently require that a Canadian manifest accompany such shipments from the U.S. shipping site to the Canadian destination.

EPA is also proposing to allow electronic submittal of export notices and annual reports currently required by Subparts E and H. The goal of this change is to make the submittal and processing of export notices and annual reports more efficient for both EPA and the regulated community, thus reducing the burden of complying with RCRA.

Finally, EPA is proposing to require exporters of ~~Hazardous~~-hazardous waste to electronically submit a short list of waste shipment data for each export shipment to the Automated Export System (AES), a joint venture between U.S. Customs and Border Protection (CBP), U.S. Census Bureau (Census), and other federal agencies. Submittal of this data will enable automated validation of the export shipment prior to its exit. Such validation will ensure the exporter's compliance with RCRA export requirements, providing immediate feedback to the exporter about any errors and returning an Internal Transaction Number (ITN) as confirmation of successful filing. In addition, the automated validation of electronically submitted hazardous waste export shipment data into AES will replace time-consuming reviews of paper documents by CBP port officers at the exit port. Finally, shipment data validated by AES will then be transmitted to EPA, and the compiled data, once reviewed and confirmed by the exporter, may be able to be used in lieu of the exporter separately submitting the export annual report currently required in Subparts E and H.

## **II. Purpose and Scope of this Work Assignment**

The purpose of this Work Assignment (WA) is to provide for all analytical assessment needs related to costs, economic impacts, benefits, small entity impacts, information collection request (ICR), document preparation, and related technical and supporting analyses necessary to sustain the Agency's promulgation of the proposed rule: "Hazardous Waste Export-Import Revisions."

The scope of this WA includes: methodology development; baseline determination; data collection, assessment, and quality control; analytic model development, and document preparation. This SOW also includes assessment of impacts to small entities, and assessment of impacts to minority and low-income communities (environmental justice), assessment of unfunded mandates, and assessment of all other Executive Orders and Acts pertinent to this action. The proposed revisions to the hazardous waste import-export

regulatory program to be covered in this WA include, but may not be limited to the three changes outlined in Section 1. These changes are:

- 1) With respect to exports, revise export requirements at 40 CFR Part 262 Subpart E and associated general export requirements in Part 263 to match relevant export requirements found at 40 CFR Part 262 Subpart H and Part 263. With respect to imports, revise import requirements at 40 CFR Part 262 Subpart F, Part 263, Part 264 and Part 265 to match relevant import requirements found at 40 CFR Part 262 Subpart H, Part 263, Part 264 and Part 265.
- 2) Allow electronic submission of export notices and annual reports required by Subparts E and H.
- 3) Require electronic submission and validation of export shipment data in the Automated Export System.

Finally, this WA includes the preparation of emergency turnaround assessments, general supporting materials, briefings, general project coordination, and ongoing communication/outreach to the WAM/TOCOR.

### **III. Work Statement**

#### **Task 1. Work Plan, Progress Reports and Budget**

Within twenty (20) days of receipt of this work assignment, the contractor shall deliver a work plan. This plan shall include a proposed level of effort, budget, schedule of tasks, and schedule of deliverables. A cost proposal shall accompany this work plan.

All data collection, assessment, and quality issues associated with this Work Assignment shall adhere to EPA data quality guidance and requirements, as established in EPA Order 5360.1A2, EPA Manual 5360.A1, and OSWER's and ORCR's Quality Management Plans. See: [http://www.epa.gov/quality/qa\\_docs.html](http://www.epa.gov/quality/qa_docs.html)

As part of the monthly progress reports for this Work Assignment, the Contractor shall provide a summary of all data collection and quality control activities conducted during each month.

No confidential business information (CBI) shall be collected or used under this Work Assignment. However, proprietary data may be used following written approval from the WAM/TOCOR.

Contractor travel is authorized under this Work Assignment. The contractor shall budget for no more than one overnight trip for two or less persons, round trip from Cambridge/Boston, MA to Arlington, VA/Washington, D.C.

**Deliverable(s) and Schedule:**

Work Plan and Budget within allotted time frame identified above.

**Task 2:**                      **Programmatic Support**

The contractor shall provide programmatic support in the area of short-term or quick turnaround technical assistance, analysis, and supporting documents to ORCR for the proposed “**Hazardous Waste Export-Import Revisions Rule**,” and related work.

Under this task the contractor shall develop and submit various general support documents and analyses directly or indirectly related to the proposed rule. Examples of such documents/analyses may include, but not be limited to:

- cost or cost savings summary tables addressing impacts of one or more of the regulatory improvement areas;
- briefing packages;
- fact sheets, flow charts, or presentation graphics;

The need for and number of such documents is uncertain at the time of this work assignment. The WAM will provide a Technical Directive (TD) designed to clarify the need and scope of such document(s), as necessary. The contractor shall budget for approximately three (3) TDs under this Task.

**Deliverable(s) and Schedule:**

<b>DELIVERABLES</b>	<b>DUE DATES</b>
Development of quick-turnaround support documents and analyses related to the rule:  To be defined in each TD (e.g., briefing package, fact sheet)	<u>Draft</u> : Five (5) Agency working days from contractor receipt of TD, and all supporting information.  <u>Final</u> : Five (5) Agency working days from contractor receipt of all written WAM comments on the draft.

**Task 3:**                      **Regulatory Support**

The contractor shall provide technical, cost, economic, human health and ecological benefits, and related analytical analyses and support to ORCR in development of the proposed regulation: “**Hazardous Waste Export-Import Revisions Rule**.”

Under this Task, the contractor shall establish an analytic baseline consisting of estimated annual export shipments of Spent Lead-Acid Batteries and other RCRA hazardous wastes. To estimate this figure, the contractor shall utilize SLAB and other hazardous waste export notice and annual report data, from 2011 to present, including the tonnage exported, the destination of the exports,

and the regulatory requirements (Subparts E or H) to which the shipments of SLABs and other hazardous waste are subject. In addition, because significant differences between EPA's export annual report data on shipments of SLABs made under consent and U.S. Census Bureau data on exports of SLABs have been documented, baseline data on all exports of SLABs from 2011 to the present will be pulled from the U.S. Census Bureau's publicly available data. The contractor shall then estimate the average container size and weight of SLAB export shipments using EPA's export annual report data and use this figure to estimate the average annual number of export shipments from the U.S. Census Bureau data. Baseline development shall be initiated upon contractor receipt of this approved work assignment.

Building from the baseline, the contractor shall develop an analytical methodology, create the analytic model, and apply this model to estimate the economic impacts, costs, and qualitatively describe human health benefits of the proposed regulatory changes. The contractor shall also identify analytical limitations associated with the assessment for each issue/improvement assessment, or summarized in aggregate.

The contractor shall build upon the methodology described in EPA's *Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation*, to complete this task. The aforementioned document shall be provided to the contractor by the WAM.

As this project advances, additional regulatory improvements, alternative options, and/or scenarios within options may be identified and require assessment. These modifications may be the result of Team determinations, ORCR management directives, or OMB comments. These additional needs will be identified, as necessary, via a Technical Directive (TD) issued by the WAM. The contractor shall budget for approximately three (3) alternative options assessment TDs under this Task.

### **Deliverable(s) and Schedule:**

Draft and final deliverables shall be presented in response to the baseline development requirements, and each Technical Directive. The first set of deliverables shall be in memo format, presenting a clear description of, and justification for the baseline, description of the analytical methodology, description of the data (universe, unit cost, etc.) and sources, presentation of findings, and identification of the key analytical limitations. The TD deliverables shall assess impacts (costs or cost savings and other benefits) to both the regulated community and governmental entities (Federal, state, and local). Tables, charts, and graphics shall be incorporated, as appropriate for both sets of deliverables, to enhance and clarify the presentation.

DELIVERABLES	DUE DATES
<p><b>A) Baseline and Methodology Development</b></p>	<p><u>Draft Methodology:</u> Methodology within fifteen (15) Agency working days following contractor receipt of this signed work assignment plus all necessary supporting information.</p> <p><u>Final Methodology:</u> Five (5) Agency working days following contractor receipt of all WAM written comments on the draft.</p>
	<p><u>Regulatory Baseline:</u> No later than ten (10) Agency working days following WAM approval of the final baseline methodology.</p>
<p><b>B) Economic impacts, costs, and benefits of the proposed approach</b></p>	<p><u>Draft Findings, by Issue:</u> No later than ten (10) Agency working days following WAM approval of final Regulatory Baseline.</p> <p><u>Final Findings:</u> No later than five (5) Agency working days following contractor receipt of all written WAM comments on the draft.</p>
<p><b>C) Per Each Technical Directive</b></p>	<p><u>Draft:</u> Five (10) Agency working days following contractor receipt of each TD plus all necessary supporting information.</p> <p><u>Final:</u> Five (5) Agency working days following contractor receipt of all TOCOR written comments on the draft.</p>

#### **Task 4:**                    **Data Collection, Review, and Evaluation**

The contractor shall collect technical data, and provide analytical support for data related to the assessment of costs, benefits, and other impacts of the revisions to the hazardous waste import-export regulations. This data collection shall include, but not be limited to the following: Spent Lead-Acid Battery (SLAB) export data from the Census Bureau, from 2011 to present, including the weight exported (kg) and the destination of the exports; EPA's export annual report data on exports of SLABs and other hazardous wastes from 2011 to the present, including the weight exported, destination of the exports and number of shipments; EPA's import data on proposed import shipments from foreign export notices and RCRA hazardous waste manifests for import shipments; and the regulatory requirements (Subparts E or H) to which the shipment of such wastes are subject. Cost data shall include, but not necessarily be limited to, labor-hour burden associated with the additional requirements of Subpart H relative to Subpart E for export and import shipments, and the additional electronic submittal of shipment data to AES.

Benefits data shall include, but not necessarily be limited to, the labor and paperwork burden reductions associated with electronic submission of export notices and annual reports, and use of compiled shipment data validated by AES in lieu of separately submitting export annual reports. Benefits will also include a qualitative description of potential human health benefits from reduced lead exposure to people living in the vicinity of secondary lead smelters, and other benefits.

The contractor shall document all data sources, collection methodology, assumptions, analytical rules, and principles used for data collection, manipulation, and analyses.

#### **Deliverable(s) and Schedule:**

The deliverable for this task shall consist of documentation of all data collected (e.g., baseline quantities, type, destination, relevant regulatory requirements, etc.), the data sources, data collection approach and quality control procedures, data assessment methodology, summary of data findings, key collection and assessment assumptions, and data limitations. Tables, charts, and graphic shall be included, as appropriate, to ensure clarity and ease of understanding.

The draft deliverable for this set shall be due to the WAM no later than twenty (20) Agency working days following contractor receipt of this approved Work Assignment. The final deliverable shall incorporate all written comments received from the WAM and be delivered no later than ten (10) Agency working days following contractor receipt of all such comments.

The final deliverable under this Task shall be used, as appropriate, in the development of deliverables under Tasks 2, 3, 5, and 6 of this Work Assignment.



## **Task 5:**                    **Economic Assessment Document**

Sub-Task A: Under this sub Task the contractor shall provide the necessary support to the Agency by conducting qualitative and quantitative analyses and assessments, and document preparation for the economic assessment document to be entitled: *Regulatory Impact Analysis of the Hazardous Waste Export-Import Revisions Rule, As Proposed*. The contractor shall document the analytical methodology, assumptions, rules and principles used in the preparation of this document. This assessment document shall address costs and/or cost savings, economic impacts, benefits, and other impacts related to all appropriate Executive Orders and Acts (e.g., environmental justice, small entity impacts, unfunded mandates). This document shall include, but not be limited to the following: executive summary, table of contents, purpose and objectives, need for regulatory action, regulatory and non-regulatory alternatives to proposed action, data and methodology, findings (cost, economic, and benefit) for each regulatory change (see Purpose), assessment of all relevant Executive Orders and Acts, key assumptions and limitations, and references.

This economic assessment shall be built upon the methodologies described in EPA's *Cost Assessment for the Final Rule on Exports and Imports of Hazardous Waste Destined for Recovery Among OECD Countries, Exports of Spent Lead-Acid Batteries from the U.S., and Import Consent Documentation*, to complete this task. The aforementioned document shall be provided to the contractor by the WAM.

This economic assessment shall adhere to all relevant requirements established under Executive Order (EO) 12866, as amended by EO 13563, OMB guidance document A-4, and the most recent EPA guidance on the preparation of economic assessments and regulatory impact analyses.

Sub-Task B: In addition to the above, the Agency may require additional supporting analyses, assessments, and documents not yet identified, but that are related to the Economic Assessment. Under this sub task, the contractor shall be prepared to develop and submit various general support documents and analyses related to alternative regulatory or non regulatory actions associated with the targeted regulatory improvements or new and currently undefined improvements. The actual need for and scope/focus of such additional support documents is uncertain at the time of issuance of this Work Assignment.. The WAM will provide a TD designed to clarify the need and scope of such document(s), as necessary. The contractor shall budget for approximately two (2) TDs under this sub Task.

### **Deliverable(s) and Schedule:**

Two sets of deliverables are required under this Task:

Sub-Task A: The contractor shall deliver draft and final versions of the complete Assessment document, as described above. The draft version shall be due to the WAM no later than five (5) working days prior to Agency Workgroup Closure for this proposed action. The final Assessment document shall incorporate all written comments received

from the WAM and be delivered no later than ten (10) Agency working days following contractor receipt of all such comments.

Sub-Task B: All deliverables under this Sub-Task shall be TD driven. No work shall be conducted or deliverables prepared under Sub-Task Area B without a Technical Directive. Draft and final deliverables shall be presented in response to each TD. The draft deliverable shall be due to the WAM no later than ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information. The final deliverable shall incorporate all written comments received from the WAM on the draft, and be due no later than five (5) Agency working days following contractor receipt of all such comments.

#### **Task 6: Information Collection Request (ICR) Document**

Subtask A: Under this Task the contractor shall provide technical support in the development of an annotated outline of the Information Collection Request (ICR) document based on the previous ICR Supporting Statement document provided to the contractor by the WAM. This annotated outline should include all sections and subsections of the document as well as shells of all necessary tables.

Subtask B: In addition to the above, the Agency may require the contractor to complete the ICR Supporting Statement document. This document shall address the information to be collected, provide the reason this information is necessary, and estimate the time and cost for the regulated entity to respond to the request, and for all affected levels of government to review and respond, as necessary. This document shall follow the standard ORCR template for preparation of regulatory ICRs, and adhere to requirements established in the EPA guidance document: ICR Handbook - *EPA's Guide to Writing Information Collection Requests Under the Paperwork Reduction Act of 1995*, as Revised November 2001. The actual need for and scope of such additional work is uncertain at the time of issuance of this Work Assignment. The WAM will provide a TD designed to clarify the need and scope of such document(s), as necessary. The contractor shall budget for approximately two (2) TDs under this sub Task.

#### **Deliverable(s) and Schedule:**

Subtask A: The annotated outline of this ICR document shall be delivered to the WAM. The draft document shall be due no later than five (5) Agency working days following contractor delivery of the first draft of the economic assessment document, as established under Task 4. The final annotated outline ICR document shall incorporate all written comments received from the WAM, and be due no later than five (5) Agency working days following contractor receipt of all such comments.

Subtask B: All deliverables under this Sub-Task shall be TD driven. No work shall be conducted or deliverables prepared under Sub-Task Area B without a Technical Directive. Draft and final deliverables shall be presented in response to each TD. The draft deliverable shall be due to the WAM no later than ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information. The final

deliverable shall incorporate all written comments received from the WAM on the draft, and be due no later than five (5) Agency working days following contractor receipt of all such comments.

<b>Summary of Deliverables and Schedule</b>		
<b><i>Task and Deliverable(s)</i></b>	<b><i>Draft</i></b>	<b><i>Final</i></b>
<b>Task 1: <u>Work Plan, Progress Reports and Budget</u></b>		
Initial Work Plan and Budget	As required by Contract.	As required by Contract.
<b>Task 2: <u>Programmatic Support</u></b>		
Development of quick-turnaround support documents and analyses related to the rule:  To be defined in each TD (e.g., briefing package, fact sheet)	<u>Draft</u> : Five (5) Agency working days from receipt of TD and all supporting information.	<u>Final</u> : Five (5) Agency working days from receipt of all written WAM comments on draft.
<b>Task 3: <u>Regulatory Support</u></b>		
A) Baseline and Methodology	<u>Draft Methodology</u> : Methodology within fifteen (15) Agency working days following contractor receipt of this signed work assignment plus all necessary supporting information.	<u>Final Methodology</u> : Five (5) Agency working days following contractor receipt of all WAM written comments on the draft.  <u>Regulatory Baseline</u> : No later than ten (10) Agency working days following WAM approval of the final baseline methodology.
B) Economic impacts, costs, and benefits	<u>Draft Findings, by Issue</u> : No later than ten (10) Agency working days following WAM approval of final Regulatory Baseline.	<u>Final Findings, by Issue</u> : No later than five (5) Agency working days following contractor receipt of all written WAM comments on the draft.
C) Per Each Technical Directive	<u>Draft</u> : Five (10) Agency working days following contractor receipt of each TD plus all necessary supporting information.	<u>Final</u> : Five (5) Agency working days following contractor receipt of all WAM written comments on the draft.
<b>Task 4: <u>Data Collection, Review, and Evaluation</u></b>		
Baseline Export and Container Size Data	Twenty (20) Agency working days following contractor receipt of this approved Work Assignment	Ten (10) Agency working days following contractor receipt of all WAM such comments on draft.
<b>Task 5: <u>Economic Assessment Document</u></b>		
Sub-Task A: Economic Assessment Document	Five (5) working days prior to Agency Workgroup Closure for this proposed action.	Ten (10) Agency working days following contractor receipt of all written comments on the draft
Sub-Task B: Additional Supporting Documents, Per Each TD.	Ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information	Five (5) Agency working days following contractor receipt of all written comments on draft

<b>Task 6: <u>Information Collection Request (ICR) Document</u></b>		
Sub-Task A: ICR Annotated Outline	Five (5) Agency working days following contractor delivery of the first draft of the economic assessment document.	Five (5) Agency working days following contractor receipt of all written comments on draft.
Sub-Task B: ICR Document	Ten (10) Agency working days following contractor receipt of the TD, plus all necessary supporting information	Five (5) Agency working days following contractor receipt of all written comments on draft

## **WORK ASSIGNMENT ADDITIONAL REQUIREMENTS OFFICE OF RESOURCE CONSERVATION AND RECOVERY**

The following additional terms and conditions are requirements of this task order:

### **TECHNICAL DIRECTION**

In accordance with EPAAR 1552.237-71–*Technical Direction*, the WAM will provide Technical Direction during performance of this Work Assignment. Technical direction includes:

1. Instruction to the contractor that approves approaches, solutions, designs, or refinements; fills in details; completes the general description of work; shifts emphasis among work areas or tasks; and
2. Evaluation and acceptance of reports or other deliverables.

Technical Direction must be within the scope of the contract-level SOW. The WAM does not have the authority to issue Technical Direction which:

1. Requires additional work outside the scope of the contract or Work Assignment;
2. Constitutes a change as defined in the "Changes" clause;
3. Causes an increase or decrease in the estimated cost of the contract or Work Assignment;
4. Alters the period of performance of the contract or Work Assignment; or
5. Changes any of the other express terms or conditions of the contract or Work Assignment.

Technical Direction will be issued in writing by the WAM, or confirmed by the WAM in writing within five (5) calendar days after oral issuance, if oral instruction provided.

### **QUALITY ASSURANCE**

Performance under this Work Assignment requires the contractor to prepare a Quality Assurance Project Plan (QAPP) to be included as part of the Work Assignment. The contractor shall submit a QAPP with its Work Plan in accordance with *EPA Requirements for Quality Assurance Project Plans (QA/R-5)* found here: <http://www.epa.gov/QUALITY/qs-docs/r5-final.pdf>. The contractor's QAPP must be approved by the WAM and Quality Assurance Manager before Work Plan approval. Following approval of the contractor's QAPP, the contractor shall perform all tasks under this Work Assignment in accordance with the quality standards established in the QAPP.

### **SURVEY MANAGEMENT**

Performance under this Work Assignment may require the contractor to create statistical surveys, perform data collection, use questionnaires, or perform statistical analysis of survey data. The contractor shall perform these tasks in accordance with the *EPA Survey Management Handbook* found here: <http://www.epa.gov/oamcinc1/0710295/attach12.pdf>.

### **COMMUNICATIONS PRODUCTS**

Performance under this Work Assignment may require the contractor to develop deliverables that are considered by EPA to be "Communications Products." If relevant, the contractor shall develop

Communications Products in accordance with *EPA's Policy and Implementation Guide for Communications Product Development and Approval* found here: <http://www.epa.gov/productreview/guide/index.html>. Additionally, if Communications Products require the use of EPA graphics, logos, or other identifiable materials, the Communications Products are further subject to the standards in *EPA's Visual and Product Standards Graphics Manual* found here: <http://wedcor.cor.epa.gov/pages/TIM/VisualIdentity-6-19-07.pdf>.

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-12				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-W-12-013			Contract Period   04/30/2012   To   04/29/2014			Title of Work Assignment/SF Site Name				
			Base                      Option Period Number      1			WA 1-12 Import/Export Rule RIA				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   04/30/2012   To   04/29/2014					
Comments: The purpose of this amendment is to approve the contractor's workplan/cost estimate dated Aug. 12, 2013 with an LOE of 950 hours and \$94,145.80 (b)(4) cost (b)(4) fee). At this time there is a cost ceiling of \$74,114. The contractor shall not exceed this ceiling until approved by contracting officer.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <span style="border: 1px solid black; padding: 2px;">22</span>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE:				
04/30/2012   To   04/29/2014										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name   Chris McMinimy							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number   703-308-0105			
							FAX Number:			
Project Officer Name   Shannon Sturgeon							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 703-605-0509			
							FAX Number: 703-308-7903			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name   Eulvid Rocque							Branch/Mail Code:			
_____ (Signature)                      (Date)							Phone Number: 202-564-8316			
							FAX Number:			

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 1-12				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000002				
Contract Number EP-W-12-013			Contract Period   04/30/2013   To   04/29/2014 Base                      Option Period Number    1			Title of Work Assignment/SF Site Name Haz. Waste Import/Export Rule				
Contractor INDUSTRIAL ECONOMICS, INCORPORATED					Specify Section and paragraph of Contract SOW					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   04/30/2012   To   04/29/2014				
Comments: The purpose of this amendment is to appoint Phuc Pahn as WAM and Chris Mc Minimy as alt. WAM.  All terms and conditions remain the same.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
SFO <span style="border: 1px solid black; padding: 2px;">22</span> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:                      Cost/Fee:                      LOE: 04/30/2013   To   04/29/2014										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:                      Cost/Fee:                      LOE:										
Cumulative Approved:                      Cost/Fee:                      LOE:										
Work Assignment Manager Name    Phuc Phan  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number   703-306-1013 FAX Number:			
Project Officer Name    Shannon Sturgeon  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 703-605-0509 FAX Number: 703-308-7903			
Other Agency Official Name  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name    Eulvid Rocque  <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 202-564-8316 FAX Number:			